

PRIVATE PLAN CHANGE REQUEST

ASSESSMENT OF ENVIRONMENTAL EFFECTS & STATUTORY ASSESSMENT

638 LIMITED

638 CAMBRIDGE ROAD,
TE AWAMUTU

SEPTEMBER 2025

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Attachments:

Attachment A – Summary of CTs and Legal Instruments

Attachment B – Legal Advice re ROW easement

Attachment C – Proposed District Plan Provisions

Attachment D – Te Awamutu Large Format Retail Centre Plan

Attachment E – Section 32 Analysis

Attachment F – General Civils and Three Waters Report

Attachment G – Ecological Impact Assessment

Attachment H – Preliminary Geotechnical Report

Attachment I – Preliminary Site Investigation Report

Attachment J – Economic Assessment

Attachment K – Transportation Assessment

Attachment L – Further Information Request

1. EXECUTIVE SUMMARY

638 Limited (the '**Applicant**') owns and operates the existing Mitre 10 store located within the Te Awamutu Large Format Retail Centre ('**TALFRC**'), a well-established commercial hub comprising various large format retail activities.

The Applicant is seeking a Private Plan Change ('**PPC**') to amend the relevant provisions of the Waipā District Plan (the '**District Plan**') as they apply to both the TALFRC at 670 Cambridge Road ('**Area A**') and the recently acquired adjoining site at 638 Cambridge Road ('**Area B**'), collectively referred to hereon as 'Plan Change Area'.

The current planning framework does not adequately enable the functional, integrated, and efficient intensification or expansion of the TALFRC, which is already fully developed, with no ability for expansion under the existing District Plan provisions.

To address this, the PPC proposes to apply a consistent Commercial Zone to Area B and extend the Large Format Retail Centre provisions to encompass the site. It also introduces a new policy within the Commercial Zone to better reflect the strategic role of the Large Format Retail Centre within the Waipā District's business hierarchy. In addition, the PPC will introduce appropriate development standards and refine the existing Large Format Retail Centre provisions to ensure that future development is comprehensively and effectively managed.

The overall intent is to facilitate the ongoing functional, integrated, and efficient intensification of the TALFRC while appropriately managing future development in response to both current and future environmental conditions.

A comprehensive assessment of the potential environmental effects associated with the PPC has been undertaken. This assessment concludes the Plan Change strikes an appropriate balance between enabling development in a manner that is consistent with the purpose and anticipated outcomes of the proposed zoning, while ensuring adverse effects associated are appropriately avoided, remedied or mitigated. These findings confirm that the proposed Commercial zoning and structure plan provisions represent the most appropriate planning response for the PPC land.

The PPC is in keeping with the outcomes sought in the National and Regional Policy Statements, and other relevant statutory documents as it enables the efficient use of land within the Plan Change area while appropriately addressing infrastructure, ecology, transportation, and amenity effects.

An evaluation in accordance with section 32 of the Resource Management Act 1991 (**'RMA'**) has been undertaken and concludes that that the proposed approach is the most appropriate for achieving the objectives for the PPC area. The analysis found that enabling commercial development through the proposed zoning and provisions is more suitable than retaining the status quo, rezoning to Commercial Zone without applying the Large Format Retail provisions, and rezoning to Industrial Zone. In weighing the social, cultural, environmental, and economic costs and benefits, as well as the potential environmental effects, the PPC is considered the most effective and efficient method for achieving the sustainable management purpose of the RMA and the Regional Policy Statement.

Accordingly, the proposed provisions are considered to represent the most appropriate use of the land.

2. APPLICANT AND PROPERTY DETAILS

Applicant:	638 Limited
Agent: <i>(Name and address for application correspondence)</i>	Planning Focus Limited PO Box 911-361 Auckland 1142 Attn: Rachelle Hui email: rh@planningfocus.co.nz
Site Address:	638 Cambridge Road, Te Awamutu 1/670 to 15/670 Cambridge Road, Te Awamutu
Legal Description:	Refer to Table 1
Total Site Area:	Refer to Table 1
Operative Waipa District Plan:	
Zone:	Medium Density Residential and Commercial Zone
Overlays:	Infrastructure Constraint Qualifying Matter River-Gully Proximity Overlay Stormwater Constraint Qualifying Matter Large Format Retail Area
Structure Plan:	Te Awamutu T11 Growth Cell
Other matters:	High Class Soil Biodiversity Corridor – 250m River Stream Corridor Transferable Development Rights – Potential TDR Donor Holdings Flood Hazard Area

3. INTRODUCTION

3.1 Mitre 10

The Applicant is the owner and operator of the Mitre 10 Te Awamutu store located in the Te Awamutu Large Format Retail Centre, located at 670 Cambridge Road, Te Awamutu.

Mitre 10 is a well-established New Zealand owned and operated home improvement, garden retailer, and trade merchant store offering a range of products including household hardware, household appliances, and building and landscaping supplies, supplying to both the general public and trade.

Mitre 10 was first established in 1974, and has 84 independent locally owned stores across the country, including the Mitre 10 store located in TALFRC . Mitre 10 has grown significantly through expansion driven by the country's growing population, and collectively employs some 8000 staff nationwide.

4. SITE DESCRIPTION

The Plan Change area includes the Applicant's landholdings at 638 Cambridge Road and 14/670 Cambridge Road, along with the other properties that are located within TALFRC (1/670 to 13/670 and 15/670 Cambridge Road).

Because the Private Plan Change ('PPC') encompasses additional landholdings within the TALFRC, the Applicant has engaged with the respective landowners during the development of the proposed provisions. Further details are provided in Section 6.2 of this report.

In this report, the sites subject to this PPC area hereon referred to as follows:

- 1/670 to 15/670 Cambridge Road **'Area A'**
- 638 Cambridge Road **'Area B'**



Figure 1: Aerial Photograph showing Plan Change Area

4.1 Certificate of Title and Interests

The Plan Change comprises seven properties, legally described as Lot 1 DP 10271, Lots 1 – Lot 5 DP 433466, Lots 1 and 2 DP 449508, and is subject to various legal interests. A summary of the relevant legal interests is included as **Attachment A**.

Address & Legal Description	Area	Owners	Interests
638 Cambridge Road (Lot 1 Deposited Plan South Auckland 10271)	40,494m ²	638 Limited	• Transfer B539961.1¹ • Easement Instrument 9036126.1²
1/670 & 2/670 Cambridge Road (Lot 5 Deposited Plan 433466)	1,846m ²	KDC Properties Limited	• Building Line Restriction S11884
3/670 Cambridge Road (Lot 1 Deposited Plan 433466)	25,726m ²	The National Trading Company of New Zealand Limited	• Building Line Restriction S61351 • Easement Instrument 8279271.4 • Consent Notice 8307979.3
4/670 – 7/670 Cambridge Road (Lot 1 Deposited Plan 449508 and Lot 2 Deposited Plan 433466)	6,845m ²	Cambridge Road Investment Limited Partnership	• Easement Instrument 8567522.4 • Easement Instrument 8567522.5
9/670 – 13/670 Cambridge Road (Lot 2 Deposited Plan 449508)	8,055m ²	Cambridge Road Investment	• Easement Instrument 8567522.6

¹ The RoW easements ((B539961.1 and 9036126.1) apply to the length of the driveway of 650 Cambridge Road. Legal advice has been sought which confirms that the easement documents do not restrict any potential increase in traffic resulting from this Plan Change Request, nor do they prohibit the installation of pedestrian facilities or parking controls, provided that these do not obstruct or impede the right of way or hinder any party's ability to use the easement. Refer to **Attachment B**.

² As per the above

		Limited Partnership	• Easement Instrument 8567522.7
14/670 Cambridge Road (Lot 3 Deposited Plan 433466)	15,405m ²	Fitzgerald Group Holdings Limited	• Easement Instrument 8567522.8 • Easement Instrument 8567522.9
15/670 Cambridge Road (Lot 4 Deposited Plan 433466)	2,272m ²	Cambridge Road Investment Limited Partnership	• Easement Instrument 8567522.10 • Easement Instrument 8567522.11 • Easement Instrument 8567522.12 • Easement Instrument 8567522.13 • Easement Instrument 8567522.14 • Easement Instrument 8567522.15 • Easement Instrument 8567522.16 • Easement Instrument 8567522.17 • Easement Instrument 8567522.18 • Easement Instrument 8567522.19 • Easement Instrument 8567522.20 • Easement Instrument 8567522.21 • Land Covenant 8567522.22 • Land Covenant 8567522.23 • Land Covenant 8567522.24 • Easement Instrument 8951896.2 • Grant of Easement without Transfer 9257720.1 • Grant of Easement without Transfer 9257720.2

Table 1: Summary of Records of Title

4.2 1/670 to 15/670 Cambridge Road (Area A)

Area A comprises six parcels of commercially zoned land, identified as 1/670 to 15/670 Cambridge Road, and collectively forms the Te Awamutu Large Format Retail Centre, covering a total area of approximately 6.0599 hectares. The area contains five commercial buildings occupied by small and large format retail, including Pak 'n' Save,

Mitre 10, Plumbing World, Guthrie Bowron, Big Barrel Liquor, and Focused Physiotherapy. The specific tenancies are shown in Figure 2 below.

The site is predominantly impervious, with only small grassed areas located in the triangular eastern corner and landscape strips along the boundaries. Light vehicle access is provided via the central vehicle crossings on Cambridge Road and the Right of Way ('RoW') to the east, over the adjoining property at 650 Cambridge Road (to the south), serving the communal parking areas within Area A. The western most vehicle access is confined to truck movements, providing access to the yard areas located along the western and southern boundaries of Area A.

Topographically, Area A is generally flat, with ground levels ranging between approximately RL 47m and RL 49m. The grassed areas along the southern portion of the site exhibit slight variation, reaching up to RL 51m in the eastern corner and dropping to around RL 46m. Stormwater management includes an overflow flow-path channel that runs along the southern boundary of the site. Public infrastructure includes wastewater and stormwater lines that extend along Cambridge Road and within the site. Public watermains are also located along Cambridge Road.



Figure 2: Aerial Photograph of Area B (showing the current tenants)

4.3 638 Cambridge Road (Area B)

638 Cambridge Road is legally described as Lot 1 Deposited Plan 10271 and measures 4.0494 hectares. The site is a rural section with the buildings situated in the northern portion of the site. The remainder of the site consists of open grass paddocks which have historically been utilised for stock grazing. Legal access to the site is taken via the RoW.

The topography of the site gently slopes from north to south (approximately RL 48.5m in the northwest to RL 46.0m in the southwest). The site features an overland flow path that conveys flood waters from east to west through the southern part of the site and into an existing wetland (discussed further below). The Mangaohoi Stream runs through the neighbouring property which at its closest point is approximately 35 metres from the southwestern site boundary (as shown in Figure 1 above). The stream channel is incised approximately 4m below the site to approximately RL 43.0m to RL 44.0m, and is subject to flooding.

Existing Infrastructure and Hydrology

A detailed assessment of the existing infrastructure, capacity, constraints, and potential solutions for the three waters and network utilities is included in the General Civils & Three Waters Report prepared by Bloxam Burnett & Olliver Ltd ('BBO') in **Attachment F**.

Presently, the subject site does not have a reticulated stormwater disposal network. Stormwater runoff from the ground discharges to ground and/or naturally flows towards the southern boundary, eventually entering a low-lying floodplain that connects to the Mangaohoi Stream.

As shown in Figure 3 below, a 450mm stormwater pipe runs east to west beneath the site, conveying stormwater from the RoW along the eastern boundary to a wetland that is primarily situated on the neighbouring property to the west. A field sump has been constructed along the western site boundary to collect and drain water from a local depression point into this pipe. As the site lies adjacent to Mangaohoi Stream, it is identified as being located within and adjacent to Flood Hazard Area.

Public wastewater reticulation network and water supply can be readily accessed from Cambridge Road. Preliminary assessments of both the wastewater and water supply systems indicate that there is sufficient capacity to support the operational needs of the proposed commercial development on the site. Additionally, utilities such as power, telecommunications, and gas are available along the road and can be extended to service the site.



Figure 3: Existing Drainage

Vegetation and Ecology

An Ecological Assessment prepared by Ecology New Zealand (**Attachment G**) has been undertaken for the subject site, and is concluded that:

“the site’s main ecological feature is extensive areas of low-value exotic pasture grasses and scattered exotic trees. Ecological values for fauna include low value habitat for common and introduced avifauna, and moderate value habitat for lizards and bats”.

The vegetation on the site is predominantly made up of exotic pasture species, along with a tall *Leylandii* hedgerow along the eastern boundary, and other mature exotic trees are scattered throughout the site. Overall, the botanical value of the vegetation is considered low.

An assessment of indigenous birds and native herpetofauna (reptiles and amphibians) was also carried out. The findings indicate that the ecological value for native birds is low, as suitable nesting and foraging habitats are limited and sparsely distributed, primarily confined to larger mature trees and the hedgerow. Similarly, due to stock grazing and mowing potential habitats for copper skinks are confined to areas of rank grass along the northern, western, and southern boundaries, as well as beneath the hedgerow. However, the habitat value for reptiles is considered moderate, given the potential presence of ‘At Risk’ native reptile species, such as the Copper Skink.

Long-tailed bats have been recorded in the surrounding area, but bat activity during the survey period was not detected on the site. This suggests that the site is not a primary feeding or roosting area and is unlikely to serve as a significant commuting corridor for bats. However, given its proximity to Mangaohoi Stream, approximately 35 meters away, it remains possible that the site supports some level of bat activity. Additionally, a high-level roost risk assessment was conducted for all mature trees on the site. Of the five trees identified, three were found to have potential roost features and were classified as high-risk bat trees. The remaining trees, though lacking roost features, were considered moderate risk due to their size. Given that long-tailed bats are a critically endangered species, the trees are attributed very high ecological value.

The wetland assessment confirms that part of the site qualifies as a wetland under the National Environmental Standards for Freshwater ('NES:F'). However, the delineation showed that the wetland onsite is limited, extending approximately 2 metres over the western boundary from the neighbouring property to the east, with the vegetation quickly transitioning into productive pasture. The wetland encroaching onto the site has been disturbed by livestock, and some water pooling was observed in the lowest areas. The ecological value of the wetland is considered high due to its reduced historic extent and the important ecological functions it serves, including filtration and flood alleviation.

Geology and Soil Contamination

A Geotechnical Assessment has been carried out by CMW Geosciences, and provided as **Attachment H** to this application. With respect to ground conditions, topsoil and uncontrolled fill was encountered at a depth between 0.5 of a metre and 1.7 metres below ground level ('bgl'), underlain by Hinuera Formation and Puketoka Formation to the depths of 5.0 metres, and 11.5 metres, respectively.

Groundwater levels within the area were recorded at a depth between 0.9 of a metre to 2.5 metres bgl. It is expected that groundwater levels will be controlled by the Mangaohoi Stream, with groundwater drawing down towards the stream. Seasonal variations in groundwater levels should be expected.

The Preliminary Site Investigation Report ('PSI') prepared by ENGEO, included as **Attachment I**, addresses potential contamination on the site. The report concludes that the site may contain imported fill with contaminant levels that could pose an unacceptable risk to human health or the environment. Additionally, the history of building construction and demolition on the site may have introduced asbestos or lead

into the shallow soil due to weathering, maintenance, and demolition activities. However, the report indicates that the change in land use from residential to commercial is highly unlikely to pose a risk to human health.

4.4 Roading Environment

The Plan Change Area ('PCA') gains access to Cambridge Road, classified as a major arterial route under the District Plan, either directly or via the legal RoW over 650 Cambridge Road. The RoW has a formed carriageway width of approximately 10 metres, and is configured with a single lane in each direction, a centre line to delineate the direction flow of traffic, and a pedestrian footpath on the eastern side. At the intersection, Cambridge Road has priority, and vehicles on the RoW are subject to give-way control. The posted speed limit on Cambridge Road for the section of road proximate to the PCA is 50km/hr.

4.5 The Wider Neighbourhood

The PCA is situated on the southern side of Cambridge Road, near the edge of the Te Awamutu township, which is situated approximately 780 metres to the east.

The site is located within a mixed-use landscape. Land use immediately to the north of the site comprises typical residential subdivision dating predominately from the mid 1900's, while areas to the south and west are generally rural in character. However, immediately west of the Plan Change area, land is currently being developed for residential purposes, known as the 'Waipiko Landing' Precinct. This master-planned neighbourhood is designed for medium-density housing and includes small-scale commercial and retail spaces, community facilities, and open spaces such as playgrounds.

4.6 Land Use Consent

Resource consent has previously been obtained to facilitate large format retail development within Area B. Notably, Resource Consent LU/119/10 was granted by Waipā District Council in 2010 for Stage 2 of the development, which enabled the establishment of the existing Mitre 10 store along with twelve additional small-scale commercial and retail tenancies. This consent was based on the Te Awamutu Large Scale Retail Development Concept Plan (discussed in Section 5.2.1 below) and reflects the approved building footprints within the TALFRC.

5. PLANNING CONTEXT

Under the District Plan, Area A is zoned *Commercial* (shaded in orange in Figure 4 below), and is subject to the following controls/overlays:

- *Large Format Retail Area*
- Soil Type - High Class Soil
- Transferable Development Rights - Potential TDR Donor Holdings

Area B is zoned *Medium Density Residential* (shaded in yellow in Figure 4), and is subject to the following controls/overlays:

- *Infrastructure Constraint Qualifying Matter Overlay*
- *River-Gully Proximity Overlay*
- *Stormwater Constraint Qualifying Matter Overlay*
- *Structure Plan Area - Future Growth Cell*
- Soil Type - High Class Soil
- Biodiversity Corridor - 250m River Stream Corridor
- Transferable Development Rights - Potential TDR Donor Holdings

The following sections details the provisions that are of relevance to this Plan Change application. For ease of reference, the relevant zoning, overlays, and controls discussed below are highlighted in *italics* above.

5.1 Zoning

5.1.1 Commercial zone

Area A is zoned as Commercial under the District Plan. The wider Commercial zone seeks to support a wide range of activities within the commercial areas to promote local self-sufficiency, reduce retail leakage from the area, and ultimately minimise commuter travel. In Te Awamutu, this objective is achieved through the establishment of a central business district that is supported by a large format retail centre and a network of local shops.

5.1.2 Medium Density Residential zone

Area B is zoned Medium Density Residential, and is applied to Waipā's urban areas, such as Te Awamutu. This zone allows for greater density, height, and scale than other residential zones, typically enabling development of up to three storeys. The purpose of this zoning is to increase housing capacity and provide greater housing choice in line with the National Policy Statement on Urban Development.

The key bulk and location controls applicable to Area B, as outlined in the District Plan, are as follows:

Rules	
Maximum Height	11 metres, except that 50% of a building's roof in elevation, measured vertically from the junction between wall and roof, may exceed this height by 1 metre, where the entire roof slopes 15° or more
Height in Relation to Boundary	Buildings must not project beyond a 60° recession plane measured from a point 4 metres vertically above ground level along all boundaries
Setbacks	Front Yard: 1.5 metres Side and Rear Yards: 1.0 metre
Site Coverage	50% of net site area 40% if within the Stormwater Constraint Qualifying Matter Overlay or within the River / Gully Proximity Qualifying Matter Overlay
Impermeable Surfaces	60% of net site area
Landscaped Area	30% of the site if within the River / Gully Proximity Qualifying Matter Overlay
Subdivision	500m ² minimum net lot area

Table 2: Bulk and Locations Controls of the Medium Density Residential Zone

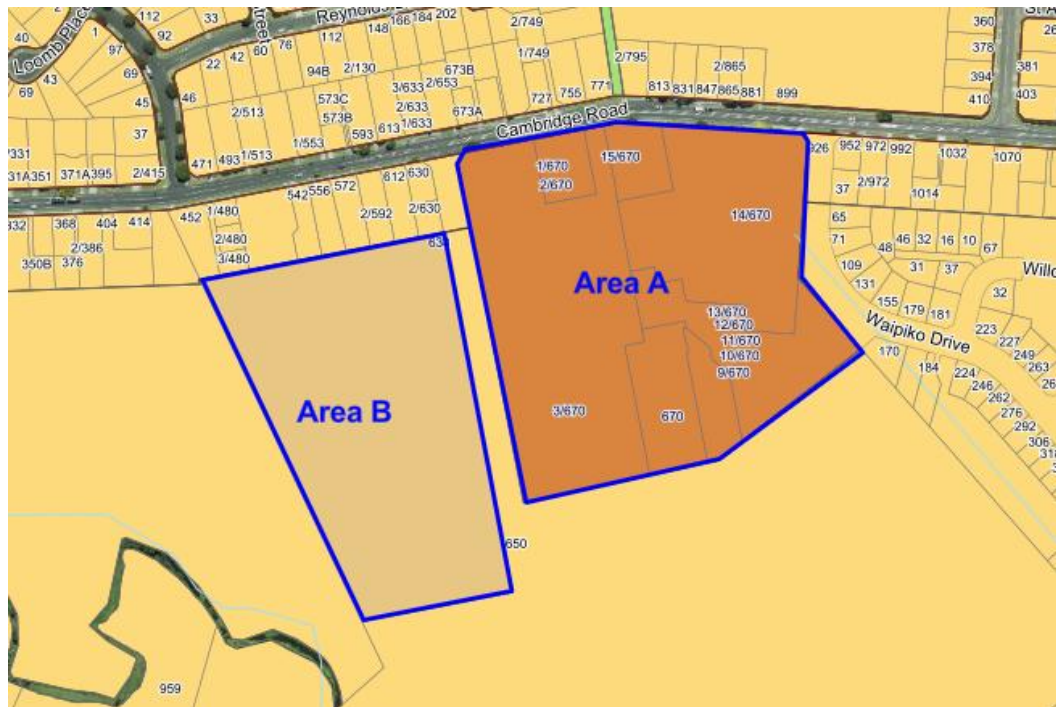


Figure 4: Zoning Map

5.2 Overlays

5.2.1 Large Format Retail Area

Area A falls within the Large Format Retail Area, which is intended to accommodate larger-scale retail activities that are not suitable for the primary commercial area. The development of this area is guided by the Te Awamutu Large Scale Retail Development Concept Plan and the provisions of the District Plan controlling gross floor areas.

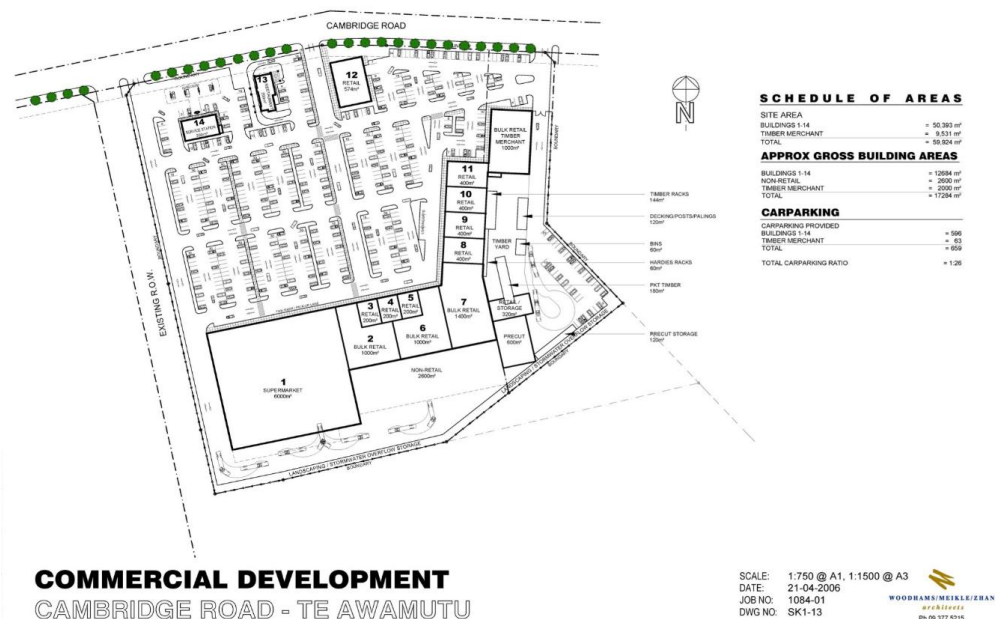


Figure 5: Te Awamutu Large Scale Retail Development Concept Plan

5.2.2 Qualifying Matter Overlays

The Qualifying Matter overlays related to infrastructure and stormwater constraints, as well as river-gully proximity, and were introduced alongside the Medium Density Residential Zone provisions. The purpose of the infrastructure and stormwater constraints overlays is to recognise existing limitations on capacity, and to manage the potential impacts of urban intensification on the Waikato and Waipā Rivers (and their associated catchments), as well as ensuring that natural hazard risks are appropriately addressed. Similarly, the River-Gully Proximity Overlay is intended to protect the ecological integrity and function of biodiversity corridors, as well as the accessibility and amenity of esplanade areas along the Waikato River, Karāpiro Stream, Mangapiko Stream, and Mangaohoi Stream, in the context of increased urban development.

5.3 **Structure Plan**

5.3.1 Te Awamutu T11 Growth Cell Structure Plan

Area B forms part of the Te Awamutu T11 Growth Cell, as identified in the Waipā 2050 Growth Strategy and the Waipā District Plan (Appendix S25 of the District Plan). The Structure Plan for this growth cell anticipates a development yield of approximately 380 allotments, equating to approximately 10 lots per hectare. In addition, a large portion of the growth cell has been identified as vulnerable to flooding and has been excluded from the developable areas.

Pertinent to Area B, the Structure Plan envisages the northern portion is to be developed for residential purposes with an 18-metre-wide local road. The remainder of Area B is recognised as being subject to flooding.

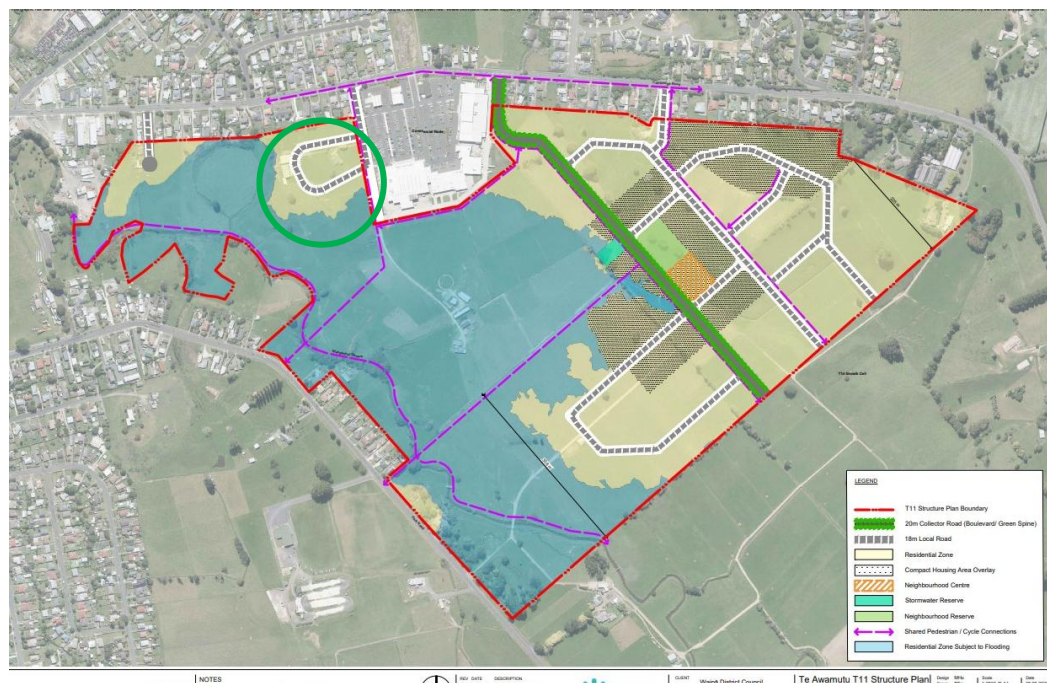
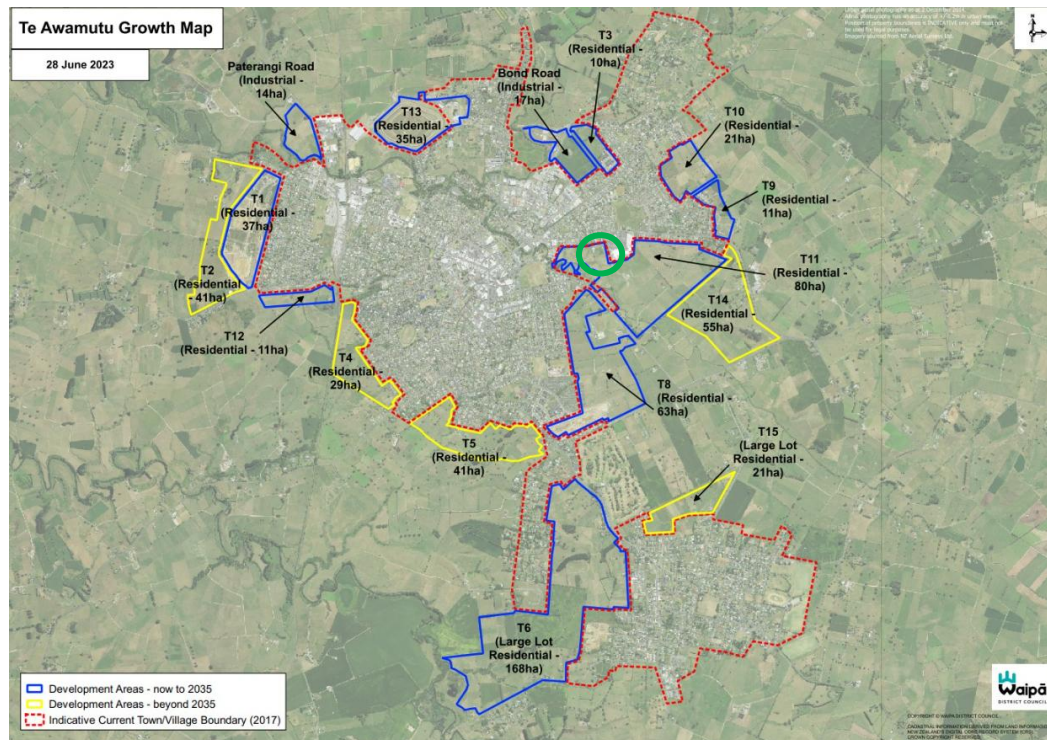


Figure 6: Te Awamutu Growth Map (top), Te Awamutu T11 Growth Cell Structure Plan (Indicative Location of Area B circled in green)

6. CONSULTATION

The following describes the consultation that has been undertaken as part of the preparation of the Plan Change and the outcomes of the consultation with the respective parties.

6.1 Waipa District Council

As part of the Plan Change preparation, a meeting was held with a representative from Waipā District Council, accompanied by extensive correspondence and discussions. This included engagement with Planning, Traffic, and Engineering staff. The purpose was to resolve as many issues as possible before lodging the Plan Change, thereby reducing or eliminating the need for further information requests later. This process also allowed the Council to address various matters and refine aspects of the planning provisions related to the Large Format Retail Centre.

Following the lodgement of the Plan Change, a request for further information was issued on 29 August 2025. A copy of Council's letter, and the Applicant's response is included as **Attachment L**.

6.2 Neighbours

Consultation has been undertaken with neighbours surrounding the Plan Change area, including occupants within the TALFRC. This involved the distribution of an information package via email, letter drop, and personal delivery. The newsletter summarised the key elements of the Plan Change and invited recipients to provide feedback. Specifically, the package was sent to residential properties north of Area B, semi-rural properties to the west and south, and commercial properties to the east.

To date, there have been no follow-up phone calls from recipients. Most of the residential and semi-rural property owners are existing Mitre 10 customers and expressed overwhelmingly positive support for the project. One residential owner raised some questions, including concerns about the potential impact of the development on a stormwater pipe located at the northern end of the property. He also noted past concerns regarding road noise and the provisions for pedestrian crossings in the development.

In relation to the commercial properties within the TALFRC, no feedback was received with exception of Foodstuff, who expressed general support for the Plan Change, including the proposed backfilling of the existing Mitre 10 site.

6.3 Mana Whenua

The Applicant has consulted with Gaylene Roberts of Ngā Iwi Tōpū o Waipā, a group representing all hapū within the Waipā District. The feedback received was generally positive, with comments provided in relation to potential landscaping opportunities

within the ecological corridor. No formal correspondence has been received at the time of writing.

7. DESCRIPTION OF THE PROPOSED PLAN CHANGE

Pursuant to Clause 22(1) of the First Schedule of the RMA, a Plan Change Request is required to include an explanation of the purpose of, and reasons for, the proposed change to a plan.

The following sets out the purpose and reasons for the Plan Change that is sought by the Applicant, and a description of the changes that are sought.

The specific changes that are sought to the relevant planning maps and provisions of the Waipa District Plan are set out in **Attachment E**.

7.1 Purpose and reasons for the Proposed Plan Change

The statutory and strategic framework (outlined in Section 9) recognises the need to support growth within the Waipā District by accommodating population increases and responding to the evolving needs of a changing demographic. Central to this is the importance of providing for commercial activities that are capable of servicing this growth in an efficient and sustainable manner.

Currently, the existing TALFRC has reached its permitted floorspace limit under the District Plan. In addition, most of the Town Centre is already developed, meaning there is little capacity available for further significant commercial expansion within the existing commercial zones. To meet the growing demand, especially for commercial services such as building improvement centres, there is a clear need to expand the capacity of the TALFRC.

The Applicant has concluded that the most efficient and practical response is to expand and intensify the existing TALFRC into the adjacent landholding (Area B), rather than relocating a building improvement centre or similar commercial activity to a separate catchment. However, Area B is currently subject to a different underlying zoning, Residential Medium Density, which brings with it a distinct set of planning provisions that are incompatible with commercial use. Specifically, the Residential Zone restricts non-residential activities unless they demonstrate a compelling and functional need to be located within a residential area, and are accompanied by a suite of bulk and location standards that are more suited for residential developments. This creates a fundamental

misalignment between the intended use of Area B and its current zoning framework, undermining the potential for efficient, integrated development.

The purpose of the PPC is therefore to rezone Area B from Residential Medium Density to Commercial Zone, consistent with the zoning that applies to the adjacent Area A. This rezoning will enable the integrated and coordinated expansion of the existing Te Awamutu Large Format Retail Area by incorporating Area B within the same planning framework. In doing so, it will support the logical extension of commercial activities, provide greater capacity to meet future demand, and ensure that development occurs in a manner that is consistent with strategic growth objectives.

The PPC also provides an opportunity to refine and update the existing Large Format Retail provisions within the District Plan. These revisions are intended to ensure that the provisions are comprehensive, clearly worded, and better equipped to guide the future development of both Areas A and B in a cohesive manner, including the opportunity for other activities to be established within the existing Mitre 10 building located in Area A, in accordance with the revised Large Format Retail provisions. This integrated approach will facilitate more efficient land use, improve urban design outcomes, and promote a more consistent relationship between zoning provisions and intended land use.

Maintaining the current zoning arrangement would limit the ability to realise these benefits. Without the Plan Change, the functional integration of Areas A and B cannot occur, and would result in a missed opportunity to respond effectively to growing commercial demand.

7.2 Description of the Changes to the Plan Provisions

The PPC proposes amendments to the planning maps, including zoning, overlay, and structure plan maps, as well as changes to the provisions of Section 6 – Commercial Zone and Section 21 – Assessment Criteria and Information Requirements, specifically in relation to Large Format Retail. Specifically, the key changes include updates to the resource management issues, objectives, and policies to more accurately reflect the role of the Te Awamutu Large Format Retail Centre within the business centre hierarchy; and revisions to the Large Format Retail provisions to incorporate Area B and provide clearer guidance for future development within Area A. Consequential amendments involve updating the relevant planning maps and excluding Area B from associated structure plans to align with its revised zoning and intended use.

The changes proposed are set out in **Attachment D** and are described below.

New insertions into the District Plan will be shown in underlined text, while deletions will appear as blue ~~struck through~~ text.

The version of the provisions lodged with this PPC are expected to be subject to further additions and alterations in further consultation with Council and other interested groups.

7.2.1 Planning Maps

The PPC seeks to rezone Area B from Residential Medium Density to Commercial Zone, aligning it with the zoning of Area A and to incorporate Area B into the Te Awamutu Large Format Retail Area. As a result, the residential qualifying matters overlays and the Te Awamutu T11 Growth Cell applicable to Area B will need to be removed to reflect the revised zoning. The relevant planning maps are shown as Figures 7 to 11 below.

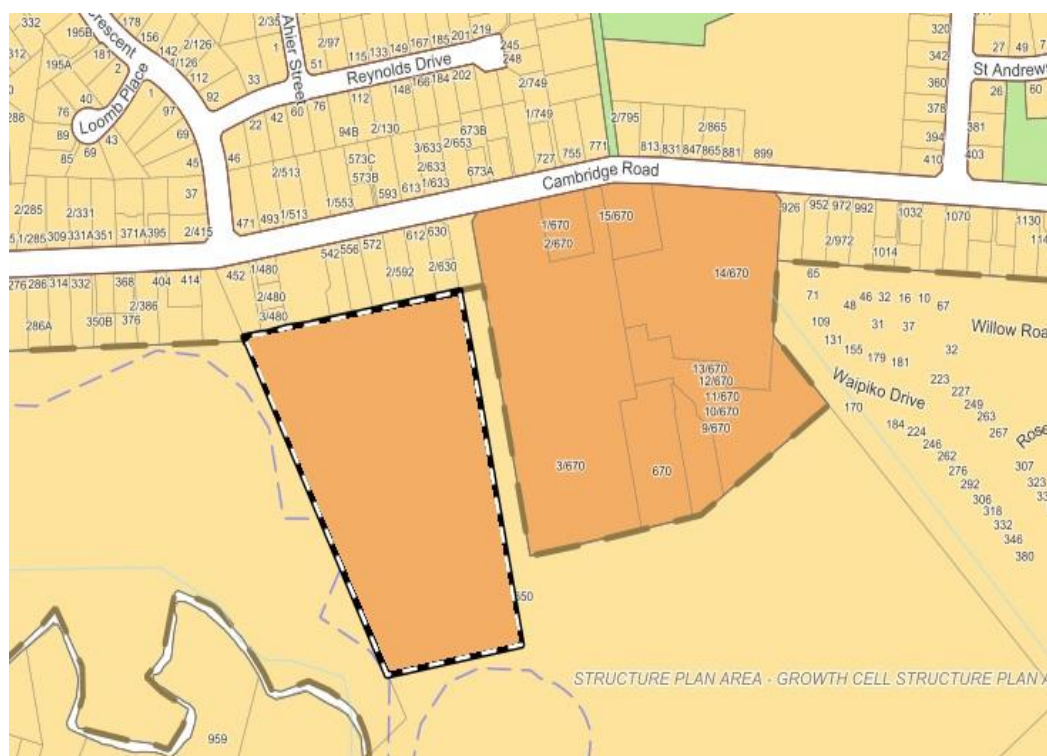


Figure 7: Proposed Planning Map: Zoning (rezone Area B to Commercial)

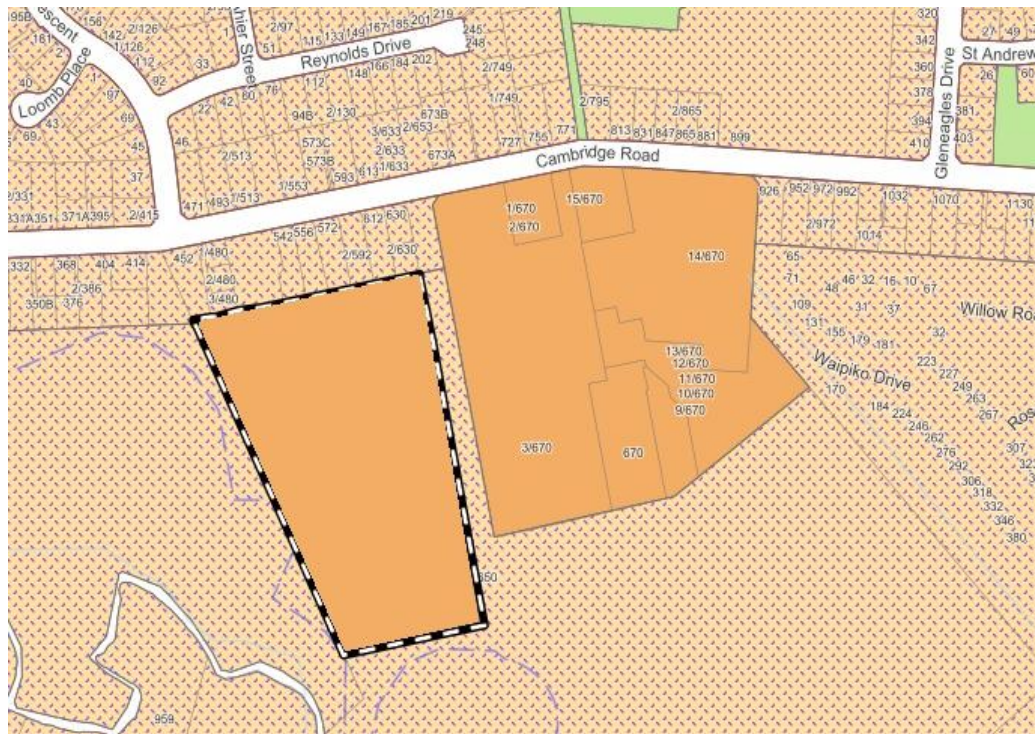


Figure 8: Proposed Planning Map: Remove Infrastructure Constraint Qualifying Matter Overlay from Area B

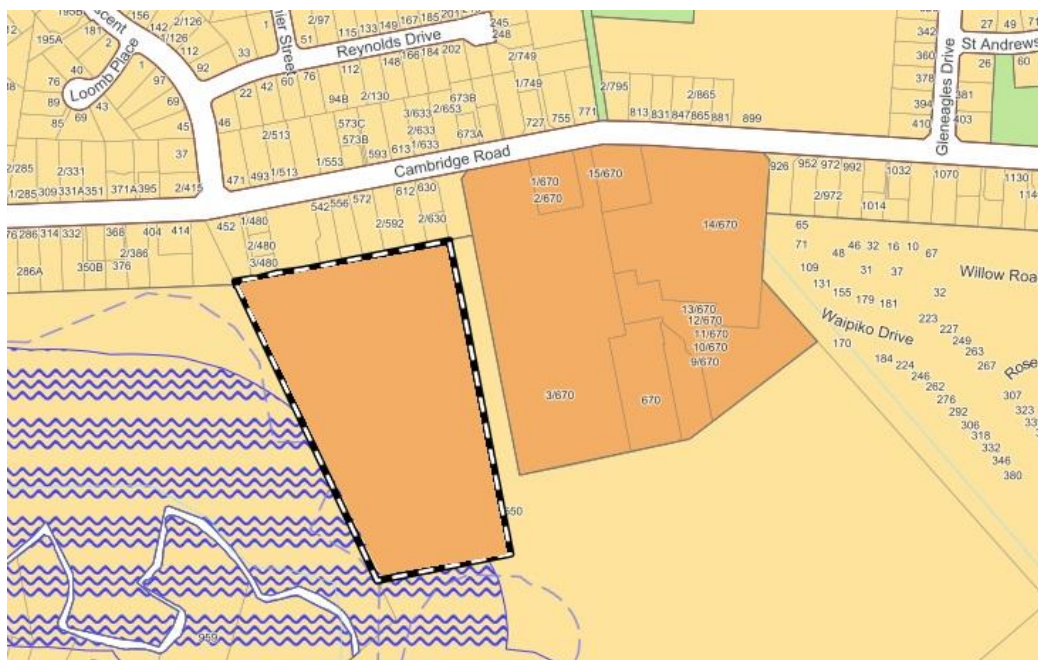


Figure 9: Proposed Planning Map: Remove River-Gully Proximity Overlay from Area B

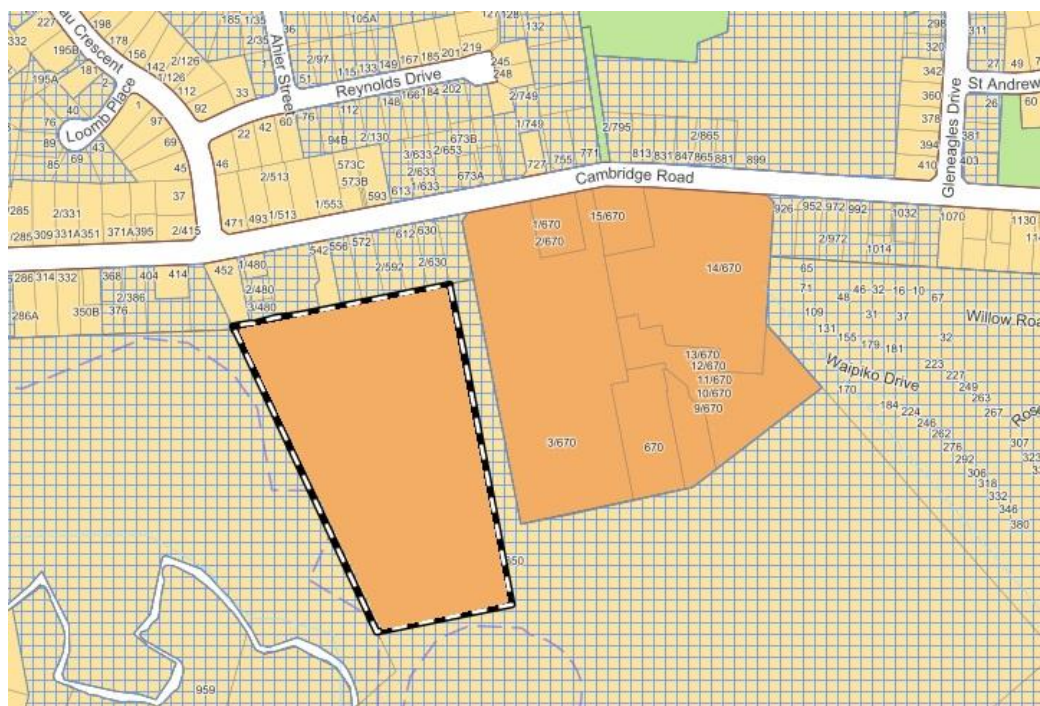


Figure 10: Proposed Planning Map: Remove Stormwater Constraint Qualifying Matter Overlay from Area B

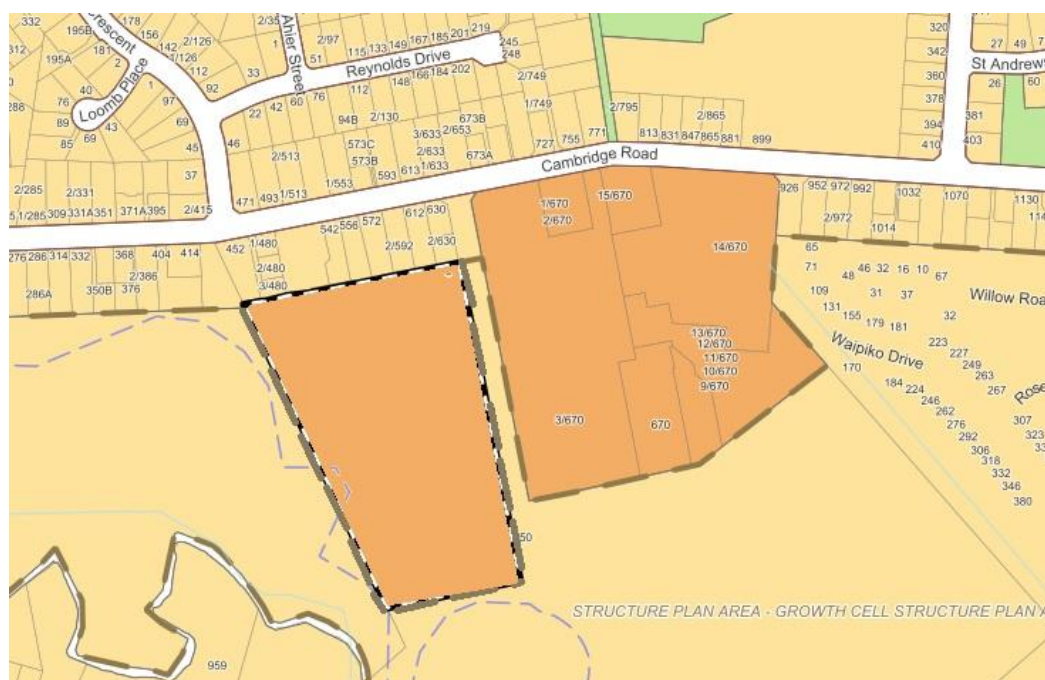


Figure 11: Proposed Planning Map: Remove Area B from the Structure Plan Area (T11 Growth Cell)

7.2.2 Section 6 - Commercial Zone

Resource Management Issues and Objectives and Policies

Amendments are proposed to the Resource Management Issues section to acknowledge the role of large format retail areas within the District's commercial hierarchy. In parallel,

a new policy is introduced to more clearly highlight the function and importance of the large format retail area within that hierarchy.

6.2 Resource Management Issues

- Amend 6.2.3 to read as follows:

While it is important to provide opportunities for further commercial development within village commercial centres, neighbourhood centres, large format retail area, and to make provisions for local shops; these opportunities need to be balanced against demand within the area they are located, and the catchment they are intended to serve.

6.3 Objectives and Policies

- Insert a new Policy, Policy 6.3.1.8, to read as follows:

Policies – Commercial hierarchy: large format retail centre (Te Awamutu)

6.3.1.8 To enable activities in the Large Format Retail Centre:

- where accommodating those activities within existing centres is difficult due to their scale and functional requirements; and
- where they do not compromise the function, role and amenity of primary commercial centres or neighbourhood centres.

Activity Status

Amendments to the existing Controlled Activity provisions and associated matters of control are proposed to align with the Te Awamutu Large Format Retail Area Plan prepared as part of this PPC. The changes also remove or update matters of control that are either no longer relevant or are already addressed in other parts of the District Plan. The PPC also specifies 'department store' within the Large Format Retail Area as a non-complying activity.

6.4.1 Activity Status

- Amend 6.4.1.2 Controlled Activity to read as follows:

6.4.1.2	Controlled activities The following activities must comply with the performance standards of this zone
a.	Any development in general accordance with the Te Awamutu Large Format Retail Area Plan Scale Retail Development Concept Plan SK1-13 prepared by Woodhams/Meikle/Zhan Architects dated 21-04-06 prepared by Woodhams Meikle Zhan Architects, referenced as DWG RC100-08, dated 26-06-2025 as contained in Appendix S6, and which satisfies the conditions included in the approved application standards in Rule 6.4.2.22.

	Matters over which Council reserves its control are: ▪ Traffic safety and road improvement works (with reference to the Traffic Impact Assessment submitted with the application documents for Plan Change 53 to the Operative District Plan, dated 1997) <u>Safe and efficient operation of the immediate transport network;</u> and ▪ Noise; and ▪ Glare and lighting; and ▪ <u>Landscaping, including wetland restoration planting;</u> and ▪ <u>Car parking (excluding the number of parking spaces), loading and vehicle manoeuvring;</u> and ▪ <u>Signs;</u> and ▪ Stormwater; (with reference to the Stormwater Assessment submitted with the application documents for Plan Change 53 to the Operative Waipā District Plan); and ▪ <u>Soil remediation in accordance with the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 /mitigation in accordance with the Statement of Evidence of Kevin Wood dated 6 November 2006 and to the satisfaction of the Principal Administrative Officers (or their delegate) of both the Waikato Regional Council and the Waipā District Council;</u> and ▪ <u>Colour, location, design and siting of buildings with reference to the visual impact report prepared by Connell Wagner and the Development Concept Plan. Location of the buildings with reference to the Te Awamutu Large Format Retail Area Plan</u> These matters will be considered in accordance with the assessment criteria in Section 21.
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- Amend 6.4.1.5 Non-complying activities to read as follows:

6.4.1.5	Non-complying activities
b.	Any departure from a Structure or Development Concept Plan <u>the Te Awamutu Large Format Retail Area Plan</u> contained in Appendix S6 Te Awamutu Large Format Retail, including development which which falls under one or more of the following categories: i. Any development which does <u>Does not satisfy one or more of the conditions standards</u> in Rule 6.4.2.22; or ii. Any development which seeks <u>Seeks</u> a greater number of buildings than <u>shown on the Te Awamutu Large Scale Retail Area Plan</u> is identified on a Structure or Development Concept Plan (excluding the area shown as 'Non-Core Retail'). iii. <u>Includes a Department Store.</u>

Performance Standards

Amendments are proposed to exempt the Te Awamutu Large Format Retail Area from the gross floor area limitations that apply to retail activities outside the pedestrian frontage area, ensuring that only Rule 6.4.2.22 is applicable to developments in this location. This exemption is intended to remove conflicting provisions that could otherwise hinder the consenting process and create unnecessary regulatory barriers.

6.4.2 Performance Standards

- Amend Rule 6.4.2.14 to read as follows:

6.4.2.14 Outside the pedestrian frontage area any retail activity in a single tenancy or ownership must be greater than 1,000m² gross floor area, provided that the following are exempt from this rule:

- a. Trade suppliers, yard based suppliers, building improvement centres, service stations, licensed premises, restaurant, cafes and other eating places; and
- b. Cambridge North Neighbourhood Centre; and.
- c. Te Awamutu Large Format Retail Area.

Note: Activities within the Te Awamutu Large Format Retail Area are subject to Rule 6.4.2.22 of the District Plan.

The Plan Change seeks various amendments to the Large Format Retail Provisions to align with the Te Awamutu Large Format Retail Area Plan prepared as part of this Plan Change Request. The Plan Change also takes the opportunity to refine the existing Te Awamutu Large Retail Area to better guide future developments in this location.

- Amend Rule 6.4.2.22 to read as follows:

6.4.2.22 Any development in general accordance with the Te Awamutu Large ~~Scale Format Retail Development Concept Area~~ Plan prepared by Woodhams Meikle Zhan Architects, referenced as DWG RC100-08, dated 26-06-2025 as contained in Appendix S6 and which ~~satisfies~~ complies with the following ~~conditions~~ standards:

- a. The aggregate gross floor area of the development in Areas A and B must not exceed that shown on the ~~Development Concept~~ Te Awamutu Large Format Retail Area Plan (being ~~7,284m²~~ 32,200m²) ~~and the aggregate gross floor area of buildings 1-12 must not exceed 12,174m² within which the gross floor area of building one (including internal mezzanine areas) must not exceed 6,200m² and the aggregate gross floor area of buildings 2-12 must not exceed 6,420m²; and~~ provided that:
 - i. There shall be a maximum of one (1) supermarket within the development with a maximum floor area (including internal mezzanine area) of 6,200m²;

- ii. The maximum aggregate gross floor area for other activities (excluding the supermarket and service station) at within Area A shall be no more than 12,700m²;
 - iii. The maximum aggregate gross floor area for activities within Area B shall be no more than 13,000m²; and
 - iv. Building(s) within Area B shall be used for trade supplier/building improvement centre and associated café only.
- b. ~~The gross floor area to be developed for retail activities within buildings 1-12 must not exceed 12,000m² and within buildings 2-12 must not exceed 6,000m², provided that~~
- With regard to the other activities enabled by (a)(ii):
- i. No more than four (4) individual retail tenancies of less than 400m² gross leaseable floor area per tenancy (excluding the service station ~~and restaurant~~) shall be permitted; and
 - ii. The maximum size of any individual retail activities shall be ~~1,500m²~~ 2,000m² gross leaseable floor area (excluding the supermarket); and
 - iii. ~~There shall be a maximum of one (1) supermarket within the development; and~~
 - iv. In addition to the (4) individual retails tenancies provided in (b)(i), There there may shall be a maximum of two (2) restaurants or cafes within Area A the development, not contributing to the limit in (2); and
 - v. Activities within the threshold set by (1) (a)(ii) that fall outside those provided for in ~~(2), (3) and (4)~~ (b)(i), (b)(ii) and (b)(iv) above include automatic teller machines, external yard display space for otherwise controlled activities, health care services, child care facilities and indoor recreational activities; and
 - vi. No building shall be located closer to the external legal boundaries of the land over and above that shown on the ~~concept plan~~ Te Awamutu Large Format Retail Area Plan ; and

- vii. Compliance with the ~~permitted activity~~ development control ~~performance~~ standards set for the Commercial Zone, excluding:
 - Rule 6.4.2.6 – Site Layout;
 - Rule 6.4.27 – Design and layout of development adjoining water bodies and reserves
 - c. Landscaping within the landscaping buffer and restoration and enhancement planting area as shown on the Te Awamutu Large Scale Retail Area Plan shall consist of an appropriate mixture of trees, shrubs and/or ground cover plants.
 - d. Prior to any activities (excluding construction) commencing within Area B, the following transport upgrades are required:
 - i. A shared pedestrian path along the southern side of Cambridge Road outside Area A and along the western side of Access 1;
 - ii. A pedestrian facility across Access 1 to provide a connection between Area A and Area B; and
 - iii. Traffic signals at the intersection of Cambridge Road and Access 1.
 - e. Prior to any activities (excluding construction) commencing within Area B, the stormwater management system as shown on the Te Awamutu Large Format Retail Area Plan has been constructed and is operational. The stormwater management required by this standard shall be designed to pre-development levels.
- Amend Rule 6.4.2.23 to read as follows:
 - 6.4.2.22 For avoidance of ~~any~~ doubt, a development will be considered to be in general accordance with the ~~Development Concept Plan~~ Te Awamutu Large Format Retail Area Plan, provided the amended development satisfies the ~~conditions~~ standards in Rule 6.4.2.22 and notwithstanding changes to the number of tenancies proposed or minor changes:
 - a. To the layout of any particular building; or
 - b. To the location of buildings (provided the change does not decrease the shortest distance between the building and external boundaries

of the development site as indicated on the Te Awamutu Large Format Retail Area Plan); ~~or~~

- ~~c. To on site vehicle circulation, precise car parking and loading locations/dimensions or to the western accessway involving the use of the existing right of way shown on the Development Concept Plan~~

Amendments are proposed to the signage provisions to allow signage that is appropriately scaled and proportionate to the size and nature of large format retail development.

- Amend Rule 6.4.2.28 to read as follows:

6.4.2.28 The following signs are permitted:

- a. Except for signs within the Te Awamutu Large Format Retail Area (contained in Appendix S6), as provided for under Rule 6.4.2.28(f),
A a sign giving information such as the name or street number of premises, the business, names of people occupying premises, and hours of operation; but containing no reference to particular products. No such sign shall exceed 3m² and the total area of permanent signs on one site must not exceed 5m².
- b. ...
- c. ...
- d. ...
- e. ...
- f. Within the Te Awamutu Large Format Retail,
 - i. A maximum of three (3) plinth signs, having a minimum of one metre setback from the road boundary. The plinth signs shall not exceed 6 metres in height and 2 metres in width.
 - ii. Wall mounted signs shall not cover more than 20% of any façade of the particular tenancy.
 - iii. All signs must only display information associated with the tenancy such as the name or street number of premises, the business, names of people occupying premises, and hours of operation, and goods/services provided on site.

7.2.3 Section 21 - Assessment Criteria and Information Requirements

Commercial Zone Assessment Criteria

Amendments to the Controlled Activity assessment criteria are proposed to align with the Te Awamutu Large Format Retail Area Plan prepared as part of this Plan Change Request. The changes also remove or update matters that are either no longer relevant or are already addressed in other parts of the District Plan.

- Amend the assessment criteria in Section 21.1.6 as follows:

Commercial Zone Assessment Criteria		
	Controlled Activities	
21.1.6.1	Any development in accordance with the Te Awamutu Large Scale Retail Area Plan Development Concept Plan SK1-13 prepared by Woodhams/Meikle/Zhan Architects dated 21-04-06 prepared by Woodhams Meikle Zhan Architects, referenced as DWG RC100-08, dated 26-06-2025 as contained in Appendix S6, and which satisfies the Rule 6.4.2.22. conditions included in the approved application	a. Whether the traffic safety and road improvement works are in accordance with the Traffic Impact Assessment submitted with the application documents for Plan Change 53 to the Operative District Plan, dated 1997. <u>The extent to which the activity avoids or mitigates adverse effects on the safe and efficient operation of the immediate transport network.</u> b. Whether noise is addressed in accordance with the conditions in the approved application. c. Whether glare and lighting is addressed in accordance with the conditions in the approved application. d. Whether landscaping is provided in accordance with the conditions in the approved application. <u>The extent to which proposed and existing landscaping contributes to the amenity of the site and manages effects on the amenity of adjoining residential zoned sites and open space.</u> e. Whether car parking (excluding conditions of the number of parking spaces for cars), loading and vehicle manoeuvring is provided in accordance with the conditions

		in the approved application. <u>The ability to provide adequate on-site loading, and manoeuvring for vehicles to avoid traffic conflict, maintain public safety and visual amenity of the streetscape.</u> f. Whether signs are provided in accordance with the conditions in the approved application. g. Whether stormwater is managed in accordance with the Stormwater Assessment submitted with the application documents for Plan Change 53 to the Operative Waipa District Plan 1997. <u>The manner in which the integrated stormwater approach addresses the adverse effects of the stormwater runoff and discharge on the receiving environment, having regard to best practicable options.</u> h. Whether soil remediation and mitigation is in accordance with the Statement of Evidence of Kevin Wood, dated November 2006 and to the satisfaction of the Principal Administrative Officers (or their delegate) of both the Waikato Regional Council and the Waipa District Council. i. Whether the colour, location, design and siting of buildings in accordance with the Visual Impact Report prepared by Connell Wagner and the Development Concept Plan. <u>The extent to which the location and scale of buildings addresses the amenity of public streets and the residential zone.</u>
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7.2.4 Te Awamutu Large Scale Retail Development Concept Plan

Appendix S6 - Te Awamutu Large Scale Retail Development Concept Plan

Amendments are proposed to replace the existing Te Awamutu Large Scale Retail Development Concept Plan, contained within Appendix S6, with the new Large Format Retail Area Plan prepared as part of this Plan Change. The revised plan will reflect the current development pattern within Area A and incorporate Area B, including updated gross floor area provisions to align with the expanded retail footprint.

- Revise the Te Awamutu Large Format Retail Site Plan to include Area B:



Figure 12: Revised Te Awamutu Large Format Retail Centre Plan

7.2.5 Future Growth Cells and Structure Plan

Appendix S1 - Te Awamutu Growth Map

Amendments are proposed to the Te Awamutu Growth Map, contained in Appendix S1 to remove Area B, reflecting its rezoning from residential to commercial. As a result, the land area and approximate yield figures will be updated to account for this exclusion.

- Amend the Te Awamutu Growth Map and Table to exclude Area B:

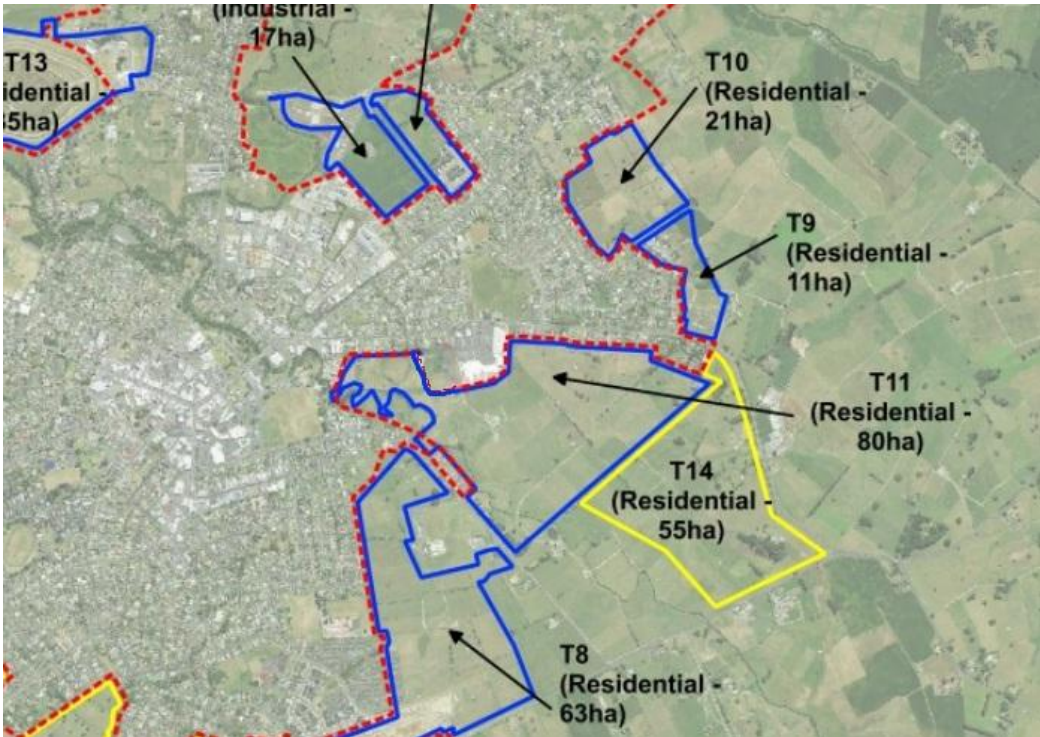


Figure 13: Proposed Planning Map: Remove Area B from the Te Awamutu Growth Map

GROWTH CELL	LAND AREA	OVERVIEW AND CAPACITY
...	...	...
T11	80ha <u>76ha</u>	• This growth cell has been identified as a residential growth cell. Development shall be undertaken in accordance with the relevant structure plan contained within this District Plan. • The growth cell has a dwelling capacity of approximately 432 <u>382</u> dwellings and represents an opportunity for housing in proximity to a commercial node which provides necessary social infrastructure shopping / medical etc.

Appendix S25 – Te Awamutu T11 Growth Cell Structure Plan

Similarly, amendments are proposed to exclude Area B, which has been earmarked for residential activities from the Te Awamutu T11 Growth Cell Structure Plan.

- Amend the Te Awamutu T11 Growth Cell Structure Plan to exclude Area B:

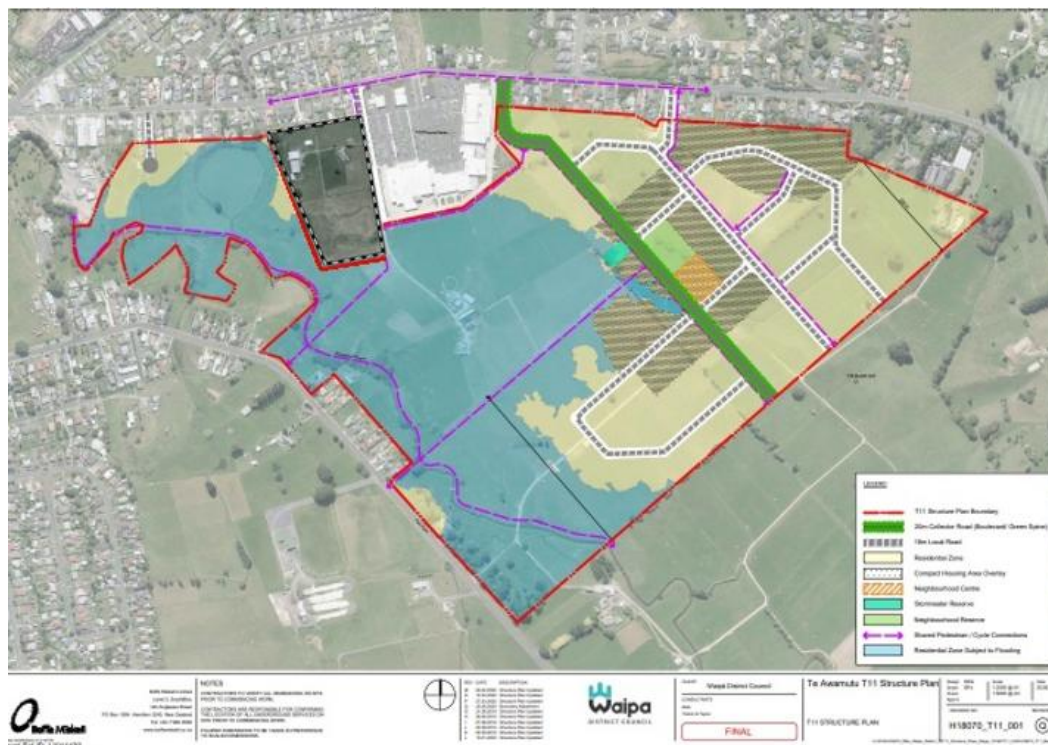


Figure 14: Proposed Planning Map: Remove Area B from the Te Awamutu Growth Cell Structure Plan

7.2.6 Elements that do not form part of the Plan Change

The Plan Change does not seek to amend any provisions detailed in Section 2A relating to Medium Density Residential zone, and associated Qualifying Matter provisions.

8. ACCEPTING THE PLAN CHANGE REQUEST UNDER CLAUSE 25

Pursuant to Clause 25, Schedule 1 of the RMA, the Council may adopt the Plan Change as if it were a proposed plan made by the Council, or it may accept the request, in whole or in part, or it may decide to deal with the request as if it were an application for resource consent.

The Council may reject the request in whole or in part, but only on the following grounds:

- (a) *the request or part of the request is frivolous or vexatious; or*
- (b) *within the last 2 years, the substance of the request or part of the request—*
 - (i) *has been considered and given effect to, or rejected by, the local authority or the Environment Court; or*
 - (ii) *has been given effect to by regulations made under section 360A; or*

- (c) *the request or part of the request is not in accordance with sound resource management practice; or*
- (d) *the request or part of the request would make the policy statement or plan inconsistent with Part 5; or*
- (e) *in the case of a proposed change to a policy statement or plan, the policy statement or plan has been operative for less than 2 years.*

In support of the above, this PPC is supported by technical and specialist assessments, along with a comprehensive evaluation demonstrating that the outcomes sought are appropriate and justified. The request is substantive and well-founded, and is neither frivolous nor vexatious.

The Waipā District Plan became operative in 2017, and the matters addressed in this Plan Change have not been considered by the Council or the Environment Court within the past two years.

A full evaluation has been undertaken in accordance with section 32 of the Resource Management Act 1991 (RMA), as set out in Section 11 of this assessment and summarised in the table appended as **Attachment E**. This evaluation confirms that the Plan Change aligns with the purpose and principles of the RMA.

The outcomes sought will promote the sustainable management of natural and physical resources, while maintaining and enhancing environmental quality. They are consistent with the strategic intent of the District Plan for the Large Format Retail Centre and reflect sound resource management practice.

Accordingly, there are no grounds that would warrant the rejection of this request by the Council.

9. STATUTORY FRAMEWORK

The request to advance the PPC has been made in accordance with the requirements of sections 74 and 75 of the RMA.

Section 75(3) of the RMA requires that a district plan must give effect to:

- Any national policy statement;
- Any New Zealand coastal policy statement;
- A national planning standard; and

- Any regional policy statement.

Section 74 outlines the matters the Waipā District Council (**‘WDC’**) must consider when preparing or amending a district plan. It requires that any plan change complies with the Council’s functions under Section 31, the purpose and principles in Part 2, and obligations under Section 32. It must also be consistent with any national policy statement, national planning standard, and relevant regulations. Additionally, WDC must have regard to any proposed regional policy statements or plans, management plans or strategies under other legislation, and any planning documents recognised by an iwi authority and lodged with the Council.

The following statutory planning documents are therefore considered relevant to Plan Change 14 and have been considered accordingly:

- Part 2 of the RMA;
- National Policy Statement on Urban Development 2020 (NPS-UD);
- National Policy Statement for Freshwater Management 2020 (NPS-FM);
- National Policy Statement for Highly Productive Land 2022 (NPS-HPL)
- National Policy Statement for Indigenous Biodiversity 2023 (NPS-IB);
- Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES-CS);
- Resource Management (National Environmental Standards for Freshwater) Regulations 2020 (NES-F);
- Te Ture Whaimana o Te Awa o Waikato (Te Ture Whaimana);
- Waikato Regional Policy Statement (RPS);
- Tai Tumu, Tai Pari, Tai Ao - Waikato-Tainui Environmental Plan;
- Te Rautaki Tāmata Ao Turoa o Hauā - Ngāti Hauā Environmental Management Plan; and
- Te Rautaki Taiao a Raukawa – Raukawa Environment Management Plan.

In addition, the following matters are also considered in this report:

- Future Proof Strategy; and

- Waipā 2050 District Growth Strategy.

The following sections provide an analysis of the PPC against the relevant statutory documents.

9.1 Resource Management Act 1991

Part 2 of the RMA 1991 sets out the Act's purpose and principles within sections five through eight.

The overriding purpose of the RMA is to promote the sustainable management of natural and physical resources, as defined in section 5(2), while –

- (a) *sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and*
- (b) *safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and*
- (c) *avoiding, remedying, or mitigating any adverse effects of activities on the environment.*

The purpose of the PPC is to enable the efficient use and intensification of the TALFRC to accommodate a building improvement centre that meets the needs of Waipā's growing population. It aligns with the RMA's purpose by making effective use of land within existing urban limits, without undermining the future viability of the Town Centre. The proposal also supports social and economic wellbeing through increased employment and retail opportunities.

Section 6 of the RMA outlines matters of national importance which shall be recognised and provided for. The Plan Change facilitates site use and development while protecting the life-supporting capacity of water and ecosystems through proposed and existing District Plan provisions. The proposed rezoning of Area B, together with these provisions, will preserve the natural character of wetlands (Section 6(a)), indigenous vegetation and fauna (Section 6(c)), the relationship of Maori with ancestral lands, water, sites, waahi tapu, and taonga (Section 6(e)), and effective hazard management (Section 6(h)), ensuring any environmental effects are avoided, remedied, or mitigated.

Section 7 of the RMA sets out matters to which persons exercising functions under the Act must have particular regard to. This Plan Change aligns with several of these, including kaitiakitanga and the ethic of stewardship (Sections 7(a) and 7(aa)), supported

through ongoing engagement with mana whenua. It promotes the efficient use and development of natural and physical resources by providing for necessary infrastructure and transport upgrades consistent with the proposed zoning (Section 7(b)). Amenity values are maintained and enhanced through a design response that reflects the surrounding mixed-use environment (Section 7(c)). The intrinsic values of ecosystems and environmental quality are supported through the preservation of wetlands and native planting to enhance habitat (Section 7(f)). Additionally, the Plan Change recognises the effects of climate change by incorporating appropriate flood hazard management measures (Section 7(i)).

Section 8 of the RMA refers to the Treaty of Waitangi. The proposal has no direct bearing on or relevance to Treaty matters.

Accordingly, it is concluded that the Plan Change is consistent with the purpose and principles of the RMA.

9.2 National Policy Statements

9.2.1 National Policy Statement on Urban Development 2020

The National Policy Statement on Urban Development (NPS-UD) came into effect on 20 August 2020. Under the NPS-UD, Waipā District is identified as a Tier 1 urban environment.

The NPS-UD establishes a framework that directs decision makers to give effect to the objectives and policies of the NPS-UD, which recognises the national significance of:

- having well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future
- providing sufficient development capacity to meet the different needs of people and communities.

The NPS-UD sets out objectives and policies that require councils to plan for long-term growth and to ensure the development of well-functioning urban environments.

The objectives and policies that are relevant to the proposal are:

Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.

Objective 2: *Planning decisions improve housing affordability by supporting competitive land and development markets.*

Objective 3: *Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply:*

- (a) the area is in or near a centre zone or other area with many employment opportunities*
- (b) the area is well-served by existing or planned public transport*
- (c) there is high demand for housing or for business land in the area, relative to other areas within the urban environment.*

Objective 4: *New Zealand's urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations.*

Objective 5: *Planning decisions relating to urban environments, and FDSs, take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).*

Objective 7: *Local authorities have robust and frequently updated information about their urban environments and use it to inform planning decisions.*

Objective 8: *New Zealand's urban environments:*

- (a) support reductions in greenhouse gas emissions; and*
- (b) are resilient to the current and future effects of climate change.*

Policy 1: *Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:*

- (b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and*
- (c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open*

*spaces, including by way of public or active transport;
and*

Policy 6: *When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters:*

- (a) the planned urban built form anticipated by those RMA planning documents that have given effect to this National Policy Statement*
- (b) that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes:*
 - (i) may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and*
 - (ii) are not, of themselves, an adverse effect*

The NPS-UD promotes urban intensification to meet housing demand while supporting the social, economic, cultural, and health needs of communities. It takes a holistic approach, recognising that residential growth must be supported by appropriate business and commercial activity.

While the proposal reduces the area zoned Residential Medium Density and does not directly provide housing, rezoning Area B to Commercial aligns with the NPS-UD's broader objectives. It responds to demand for commercial land in Te Awamutu and enables more efficient land use to support the district's ongoing growth and wellbeing. Expanding the existing TALFRC consolidates large format retail activity and avoids duplicating infrastructure in separate locations.

An Economic Assessment found that rezoning approximately four hectares would provide economic benefits, support employment and growth, enhance market competitiveness. The impact on housing supply is minimal, given the district's surplus residential capacity.

With regard to Policy 6, the site is identified for future growth in both Future Proof (a 30-year sub-regional growth strategy) and Waipā 2050 (the district's long-term growth framework). The Plan Change's alignment with these strategies is assessed below.

While the rezoning may change amenity values for some, Policy 6(b) clarifies that such change is not necessarily adverse. The planning provisions in this Plan Change aim to protect natural features and ensure future development of Area B is undertaken in an integrated manner that maintains a high standard of urban amenity.

For these reasons, the Plan Change is considered to align with the objectives and policies of the NPS-UD, and contribute to a well-functioning urban environment.

9.2.2 National Policy Statement for Freshwater Management 2020

The National Policy Statement for Freshwater Management (NPS-FM) came into effect on 3 September 2022. The NPS-FM creates a framework that directs council on how to manage freshwater in a way that gives effect to Te Mana o te Wai, including the health and well-being of water bodies and freshwater ecosystems is maintained and improved.

The objectives and policies that are relevant to the proposal are:

- (1) *The objective of this National Policy Statement is to ensure that natural and physical resources are managed in a way that prioritises:*
 - (a) *first, the health and well-being of water bodies and freshwater ecosystems*
 - (b) *second, the health needs of people (such as drinking water)*
 - (c) *third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.*

Policy 1: *Freshwater is managed in a way that gives effect to Te Mana o te Wai.*

Policy 2: *Tangata whenua are actively involved in freshwater management (including decision-making processes), and Māori freshwater values are identified and provided for.*

Policy 3: *Freshwater is managed in an integrated way that considers the effects of the use and development of land on a whole-of-catchment basis, including the effects on receiving environments.*

Policy 4: *Freshwater is managed as part of New Zealand's integrated response to climate change.*

Policy 5: *Freshwater is managed (including through a National Objectives Framework) to ensure that the health and well-being of degraded water bodies and freshwater ecosystems is improved, and the health and well-being of all other water bodies and freshwater ecosystems is maintained and (if communities choose) improved.*

Policy 6: *There is no further loss of extent of natural inland wetlands, their values are protected, and their restoration is promoted.*

Policy 9: *The habitats of indigenous freshwater species are protected.*

Policy 13: *The condition of water bodies and freshwater ecosystems is systematically monitored over time, and action is taken where freshwater is degraded, and to reverse deteriorating trends.*

Policy 14: *Information (including monitoring data) about the state of water bodies and freshwater ecosystems, and the challenges to their health and well-being, is regularly reported on and published.*

Policy 15: *Communities are enabled to provide for their social, economic, and cultural wellbeing in a way that is consistent with this National Policy Statement.*

The PPC aligns with the provisions of the NPS-FM by precluding the area around the confirmed natural wetland from development, and by providing for an enlarged planted wetland area that will control stormwater runoff and ensure the ongoing viability of the existing wetland.

9.2.3 National Policy Statement for Highly Productive Land 2022

The National Policy Statement for Highly Productive Land (NPS-HPL) came into effect on 17 October 2022. The NPS-HPL aims to ensure that *highly productive land is protected for use in land-based primary production, both now and for future generations*. It applies to rural production land containing soils classified under Land Use Capability (LUC) classes 1 to 3.

However, Clause 3.5(7) of the NPS-HPL specifies that "highly productive land" does not include land identified for future urban development.

As Area B is zoned Residential Medium Density, it qualifies as land identified for future urban development and is therefore excluded under Clause 3.5(7).

Accordingly, the NPS-HPL does not apply to this request.

9.2.4 National Policy Statement for Indigenous Biodiversity 2023

The National Policy Statement for Indigenous Biodiversity 2023 (NPS-IB) came into effect 4 August 2023. It provides direction to councils to protect, maintain and restore indigenous biodiversity requiring at least no further reduction nationally.

The objectives and policies that are of relevant to the proposal are:

- (1) *The objective of this National Policy Statement is:*
 - (a) *to maintain indigenous biodiversity across Aotearoa New Zealand so that there is at least no overall loss in indigenous biodiversity after the commencement date; and*
 - (b) *to achieve this:*
 - (i) *through recognising the mana of tangata whenua as kaitiaki of indigenous biodiversity; and*
 - (ii) *by recognising people and communities, including landowners, as stewards of indigenous biodiversity; and*
 - (iii) *by protecting and restoring indigenous biodiversity as necessary to achieve the overall maintenance of indigenous biodiversity; and*
 - (iv) *while providing for the social, economic, and cultural wellbeing of people and communities now and in the future.*

Policy 1: *Indigenous biodiversity is managed in a way that gives effect to the decision-making principles and takes into account the principles of the Treaty of Waitangi.*

Policy 2: *Tangata whenua exercise kaitiakitanga for indigenous biodiversity in their rohe, including through:*

- (a) managing indigenous biodiversity on their land; and*
- (b) identifying and protecting indigenous species, populations and ecosystems that are taonga; and*
- (c) actively participating in other decision-making about indigenous biodiversity.*

Policy 3: *A precautionary approach is adopted when considering adverse effects on indigenous biodiversity.*

Policy 4: *Indigenous biodiversity is managed to promote resilience to the effects of climate change.*

Policy 10: *Activities that contribute to New Zealand's social, economic, cultural, and environmental wellbeing are recognised and provided for as set out in this National Policy Statement.*

Policy 13: *Restoration of indigenous biodiversity is promoted and provided for.*

Policy 14: *Increased indigenous vegetation cover is promoted in both urban and nonurban environments.*

Policy 15: *Areas outside SNAs that support specified highly mobile fauna are identified and managed to maintain their populations across their natural range, and information and awareness of highly mobile fauna is improved.*

The PPC is considered consistent with the intended outcomes of maintaining and enhancing indigenous biodiversity of the Plan Change Area.

The Ecological Impact Assessment (**Attachment G**) prepared by Ecology New Zealand identified some limited potential habitat for indigenous species, such as copper skinks and long-tailed bats. However, no individuals were observed during the site assessments or surveys. Notwithstanding, indigenous biodiversity within Area B will be maintained and enhanced through new provisions introduced as part of the Plan Change. These provisions include restoration planting of native species around the perimeter of the stormwater management system and the existing natural wetland to reduce the impact of the development of Area B, and provide opportunities to enhance the site for indigenous fauna.

9.3 National Environmental Standards

Section 43 of the RMA allows the Governor-General to pass National Environmental Standards, which impose national regulations on particular activities. The following National Environmental Standards are relevant to the assessment of the Plan Change Request.

9.3.1 Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011

The National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health (NES:CS) sets the standards for assessing and managing soil contamination and applies to land use, development, and related activities.

ENGEO has prepared a Preliminary Site Investigation Report (**Attachment I**), which confirms that historical earthworks across the area, including the filling of a gully in the southern part of Area B, may have resulted in soil contamination. However, the report concludes that the proposed rezoning from residential to commercial use qualifies as a Permitted Activity under Regulation 8(4) of the NES:CS, as it is highly unlikely to pose a risk to human health if the activity is carried out on the land.

Further assessment of the fill material will be required to determine the level of any contaminants present and to inform the management of all future ground disturbance activities.

As such, compliance with the NES:CS can be addressed during future resource consent processes, aligned with the scope of proposed development. The PPC is not implicated by the NES:CS.

9.3.2 National Environmental Standard for Freshwater 2020

The National Environmental Standards for Freshwater (NES:F) regulate activities that may impact freshwater and freshwater ecosystems.

Under the NES:F, specific rules apply to activities occurring within 10 metres and 100 metres of natural inland wetlands. Any activities within these setback areas that trigger the NES:F will require resource consent from the Regional Council.

It is anticipated that resource consents will be required as part of the future development of Area B for certain activities near the identified natural wetlands, and in particular the diversion of stormwater within 100 metres of a natural wetland. The Plan Change intends

to enhance and protect the identified wetland as part of the development, with the provision of a no-building zone, and for the wetland to form part of the site's integrated stormwater management system (refer to the Te Awamutu Large Format Retail Area Plan).

Importantly, the proposed zoning and land uses enabled by the Plan Change do not involve the drainage of any natural wetlands.

As a result, the Plan Change is not expected to pose a risk to freshwater or freshwater ecosystems.

9.4 Strategic Framework

9.4.1 Te Ture Whaimana O Te Awa O Waikato – Vision and Strategy for the Waikato River

Te Ture Whaimana – Vision and Strategy for the Waikato River was established under the Waikato-Tainui Raupatu Claims (Waikato River) Settlement Act 2010, the Upper River Acts (Ngāti Tūwharetoa, Raukawa and Te Arawa River Iwi Waikato River Act 2010), and the Ngā Wai o Maniapoto (Waipā River) Act 2012. These Settlement Acts recognise Te Ture Whaimana as the primary direction-setting document for the Waikato and Waipā Rivers and their catchments.

Te Ture Whaimana is fully incorporated into the Waikato Regional Policy Statement and must be given effect to in all regional and district plans. It overrides any inconsistent provisions in the Regional Policy Statement, National Policy Statements, and the New Zealand Coastal Policy Statement.

Te Ture Whaimana applies to the Waikato River from Huka Falls to Te Puuaha o Waikato and the length of the Waipa River to its junction with the Waikato River, and associated activities that would affect the Waikato River.

The Vision for the strategy is:

“...for a future where a healthy Waikato river sustains abundant life and prosperous communities who, in turn, are all responsible for restoring and protecting the health and wellbeing of the Waikato river, and all it embraces, for generations to come.”

The objectives that are of relevant to the proposal are:

- a. *The restoration and protection of the health and wellbeing of the Waikato River.*

- b. The restoration and protection of the relationship of Waikato-Tainui with the Waikato River, including their economic, social, cultural, and spiritual relationships.*
- c. The restoration and protection of the relationship of Waikato River iwi according to their tikanga and kawa, with the Waikato River, including their economic, social, cultural and spiritual relationships.*
- d. The restoration and protection of the relationship of the Waikato region's communities with the Waikato River including their economic, social, cultural and spiritual relationships.*
- e. The integrated, holistic and coordinated approach to management of the natural, physical, cultural and historic resources of the Waikato River.*
- f. The adoption of a precautionary approach towards decisions that may result in significant adverse effects on the Waikato River, and in particular those effects that threaten serious or irreversible damage to the Waikato River.*
- g. The recognition and avoidance of adverse cumulative effects, and potential cumulative effects, of activities undertaken both on the Waikato River and within its catchments on the health and wellbeing of the Waikato River.*
- h. The recognition that the Waikato River is degraded and should not be required to absorb further degradation as a result of human activities.*
- i. The protection and enhancement of significant sites, fisheries, flora and fauna.*
- j. The recognition that the strategic importance of the Waikato River to New Zealand's social, cultural, environmental and economic wellbeing is subject to the restoration and protection of the health and wellbeing of the Waikato River.*
- k. The restoration of water quality within the Waikato River so that it is safe for people to swim in and take food from over its entire length.*
- l. The promotion of improved access to the Waikato River to better enable sporting, recreational, and cultural opportunities.*

- m. *The application to the above of both maatauranga Maaori and latest available scientific methods.*

The PPC aligns with Te Ture Whaimana by promoting sustainable stormwater management that minimises impacts on the Mangaohoi Stream and the Waipā River. Provisions for wetland restoration, planting, and greater building setbacks help manage cumulative impacts on the well-being of the watercourses. While stormwater runoff will increase, it will be effectively managed. The shift from agriculture to commercial use will also reduce nutrient discharges, resulting in improved environmental outcomes for the Waipā catchment.

9.4.2 Waikato Regional Policy Statement: Te Tauāki Kaupapahere Te-Rohe O Waikato

The Waikato Regional Policy Statement (RPS) identifies the resource management issues of the Waikato region, and sets out the policies and methods that will be used to achieve integrated management of the natural and physical resources of the region. Pursuant to section 75(3)(c) of the RMA the Waipā District Plan must give effect to the RPS.

Parts 2 and 3 of the RPS outlines objectives and policies related to various matters. The relevant provisions are detailed below:

Integrated Management

IM-O1 – Integrated management

Natural and physical resources are managed in a way that recognises:

1. *the inter-relationships within and values of water body catchments, riparian areas and wetlands, the coastal environment, the Hauraki Gulf and the Waikato River;*
2. *natural processes that inherently occur without human management or interference;*
3. *the complex interactions between air, water, land and all living things;*
4. *the needs of current and future generations;*
5. *the relationships between environmental, social, economic and cultural wellbeing;*
6. *the need to work with agencies, landowners, resource users and communities; and*

7. *the interrelationship of natural resources with the built environment.*

IM-04 – Health and wellbeing of the Waikato River

The health and wellbeing of the Waikato River is restored and protected and Te Ture Whaimana o Te Awa o Waikato (the Vision and Strategy for the Waikato River) is achieved.

IM-05 – Adapting to climate change

Land use is managed to:

1. *avoid the potential adverse effects of climate change induced weather variability and sea level rise on:*
 - a. *amenity;*
 - b. *the built environment, including infrastructure;*
 - c. *indigenous biodiversity;*
 - d. *natural character;*
 - e. *public health and safety; and*
 - f. *public access.*
2. *support reductions in greenhouse gas emissions within urban environments and ensure urban environments are resilient to the current and future effects of climate change.*

IM-06 – Ecosystem services

The range of ecosystem services associated with natural resources are recognised and maintained or enhanced to enable their ongoing contribution to regional wellbeing.

IM-09 – Amenity

1. *The qualities and characteristics of areas and features, valued for their contribution to amenity, are maintained or enhanced.; and*
2. *Where intensification occurs in urban environments, built development results in attractive, healthy, safe and high-quality urban form which responds positively to local context whilst recognising that amenity values change over time in response to the changing needs of people, communities and future*

generations, and such changes are not, of themselves, an adverse effect.

The PPC adopts an integrated approach to expanding the Te Awamutu Large Format Retail Area by recognising the interconnections between land, water, ecosystems, and the built environment. It balances environmental, social, economic, and cultural wellbeing by responding to the site's natural features and the needs of both current and future generations. The inclusion of a designated Wetland Restoration Area, with native planting and protection measures, enhances ecosystem health and supports a range of ecosystem services, including water quality improvement and biodiversity support. Stormwater management and setbacks from flood-risk areas contribute to climate change resilience, reducing risk to public safety, amenity, and infrastructure. The PPC also respects the amenity values of the surrounding mixed-use environment by managing the interface with nearby residential and rural-residential areas to ensure an attractive, healthy, and context-sensitive urban form. While changes to amenity are expected, such changes reflect evolving community needs and are not inherently adverse.

Although the Waikato River is not directly within the Plan Change Area, the approach taken aligns with the principles of Te Ture Whaimana o Te Awa o Waikato by promoting environmental restoration and sustainable land use within the wider catchment.

Land and freshwater

LF-O1 – Mauri and values of fresh water bodies

Maintain or enhance the mauri and identified values of fresh water bodies including by:

- 1. maintaining or enhancing the overall quality of freshwater within the region;*
- 2. safeguarding ecosystem processes and indigenous species habitats;*
- 3. safeguarding the outstanding values of identified outstanding freshwater bodies and the significant values of wetlands;*
- 4. safeguarding and improving the life supporting capacity of freshwater bodies where they have been degraded as a result of human activities, with demonstrable progress made by 2030;*

5. *establishing objectives, limits and targets, for freshwater bodies that will determine how they will be managed;*
6. *enabling people to provide for their social, economic and cultural wellbeing and for their health and safety;*
7. *recognising that there will be variable management responses required for different catchments of the region; and*
8. *recognising the interrelationship between land use, water quality and water quantity.*

LF-O3 – Riparian areas and wetlands

Riparian areas (including coastal dunes) and wetlands are managed to:

1. *maintain and enhance:*
 - a. *public access; and*
 - b. *amenity values.*
2. *maintain or enhance:*
 - a. *water quality;*
 - b. *indigenous biodiversity;*
 - c. *natural hazard risk reduction;*
 - d. *cultural values;*
 - e. *riparian habitat quality and extent; and*
 - f. *wetland quality and extent.*

Ecosystems and indigenous biodiversity

ECO-O1 – Ecological integrity and indigenous biodiversity

The full range of ecosystem types, their extent and the indigenous biodiversity that those ecosystems can support exist in a healthy and functional state.

Water quality and ecological integrity will be enhanced through the exclusion of livestock from fresh water bodies, the application of effective sediment control, and native planting within riparian and wetland areas. These measures support the mauri and ecological values of freshwater bodies by safeguarding indigenous habitats, improving degraded systems, and strengthening the connection between land use and water

health. They also contribute to the resilience and functionality of ecosystems, aligning with regional objectives for biodiversity, wetland extent, and water quality.

Hazards and risks

HAZ-O1 – Natural hazards

The effects of natural hazards on people, property and the environment are managed by:

1. *increasing community resilience to hazard risks;*
2. *reducing the risks from hazards to acceptable or tolerable levels;*
and
3. *enabling the effective and efficient response and recovery from natural hazard events.*

As discussed in the preceding section, the PPC avoids potential adverse effects of natural hazards, such as flood risk, on people, property, and the environment by delineating flood zones. In addition, the BBO report establishes minimum freeboard levels. These measures increase community resilience by reducing exposure to flood risk, ensuring development is safe, and supporting effective response and recovery from natural hazard events.

Natural character

NATC-O1 – Natural character

The natural character of the coastal environment, wetlands, and lakes and rivers and their margins are protected from the adverse effects of inappropriate subdivision, use and development.

The PPC is cognisant of the wetland located within Area B, and has been formulated to protect their natural character through the designation of a Wetland Restoration Area, where native planting and ecological enhancement will safeguard the integrity, appearance, and ecological functions of the wetlands and their margins, thereby preventing adverse effects on these sensitive natural environments.

Urban Form and Development

UFD-O1 – Built environment

Development of the built environment (including transport and other infrastructure) and associated land use occurs in an integrated, sustainable

and planned manner which enables positive environmental, social, cultural and economic outcomes, including by:

- 1. promoting positive indigenous biodiversity outcomes;*
- 2. preserving and protecting natural character, and protecting outstanding natural features and landscapes from inappropriate subdivision, use, and development;*
- 3. integrating land use and infrastructure planning, including by ensuring that development of the built environment does not compromise the safe, efficient and effective operation of infrastructure corridors;*
- 4. integrating land use and water planning, including to ensure that sufficient water is available to support future planned growth;*
- 7. minimising land use conflicts, including minimising potential for reverse sensitivity;*
- 8. anticipating and responding to changing land use pressures outside the Waikato region which may impact on the built environment within the region;*
- 10. promoting a viable and vibrant central business district in Hamilton city, with a supporting network of sub-regional and town centres; and*
- 11. providing for a range of commercial development to support the social and economic wellbeing of the region; and*
- 12. strategically planning for growth and development to create responsive and well-functioning urban environments, that:*
 - a. support reductions in greenhouse gas emissions and are resilient to the current and future effects of climate change;*
 - b. improve housing choice, quality, and affordability;*
 - c. enable a variety of homes that enable Māori to express their cultural traditions and norms;*
 - d. ensure sufficient development capacity, supported by*

integrated infrastructure provision, for identified housing and business needs in the short, medium and long term;

- e. improves connectivity within urban areas, particularly by active transport and public transport;*
- f. take into account the values and aspirations of hapū and iwi for urban development.*

The PPC will be consistent with the above objective by ensuring development occurs in an integrated and sustainable way. It includes planning provisions that enable efficient use and further development of the area, promoting positive indigenous biodiversity outcomes and protecting natural character from urban impacts, while managing adverse effects on surrounding land uses. Although it does not directly address housing supply or options, the PPC appropriately enables the expansion of an existing commercial node within an established area to meet growth demand and support a vibrant commercial centre that enhances regional social and economic wellbeing. Overall, it contributes to a responsive and well-functioning urban environment consistent with the outcomes anticipated by the RPS.

9.4.3 Tai Tumu, Tai Pari, Tai Ao – Waikato Tainui Environmental Management Plan

The purpose of Tai Tumu, Tai Pari, Tai Ao is to guide the restoration of the Waikato-Tainui rohe by setting out the tribe's environmental values, knowledge, and relationship with natural resources. It promotes a unified approach to environmental management, supports tribal authority and kaitiakitanga, and encourages collaboration with decision-makers.

Specific to the PPC, the need to enhance and protect freshwater is a key focus of Tai Tumu, Tai Pari, Tai Ao. While addressed through regional objectives and policies, these outcomes are also reflected at the district level through the introduction of new provisions created by this Plan Change. As such, the PPC inherently considers Tai Tumu, Tai Pari, Tai Ao by translating its goals into planning provisions, such as landscape enhancement, wetland restoration, and on-site stormwater management.

9.4.4 Te Rautaki Taiao A Raukawa – Raukawa Environmental Management Plan 2015

Te Rautaki Taiao a Raukawa sets out Raukawa's environmental issues, aspirations, and priorities, guiding our involvement in current and future policy, planning, and resource

management. It's vision is a healthy environment and thriving people, grounded in the interconnectedness of all life, the restoration of relationships, and the honouring of Raukawa whakapapa and kaitiaki responsibilities. Achieving this requires coordinated, collaborative, and well-communicated efforts aligned with the Plan's aspirations.

The PPC aligns with Raukawa policies on natural character, environmental values, climate change resilience, and natural hazard management. It acknowledges the impact of discharges, such as stormwater from on-site systems, on water quality and the health of waterbodies. In response, it encourages the integration of effective stormwater management solutions. The PPC also emphasises the importance of recognising ecological interconnectedness and enhancing indigenous biodiversity, particularly through restoration and enhancement planting around waterbodies, as set out in the Te Awamutu Large Format Retail Area Plan and supporting planning provisions.

9.4.5 Other Iwi Management Plans

Other Iwi Management Plans, including Te Rautaki Tāmata Ao Turoa o Hauā – Ngāti Hauā Environmental Management Plan, Ko Tā Maniapoto Mahere Taiao – Maniapoto Environmental Management Plan, and Hingakākā-Ngāroto Iwi Management Plan have been reviewed.

As the PPC lies outside the areas identified by these iwi groups as being of particular interest or within their respective mana whenua, no further assessment has been undertaken.

9.5 **Other Documents**

9.5.1 Future Proof Strategy 2024

The Future Proof Strategy is a 30-year growth management and implementation plan covering the Hamilton, Waipā, Waikato, and Matamata-Piako sub-regions. Updated in 2024 to align with the NPS-UD, the Strategy provides a coordinated and staged approach to growth while addressing complex planning challenges.

Te Awamutu has been identified as a key growth area with the potential to evolve into a Future Metro Centre. Within this context, Area B, currently located in the Te Awamutu T11 Growth Cell, is earmarked for short-term development.

The PPC proposes rezoning 4.4 hectares of residential land to commercial use. This minor reduction in residential zoning is not expected to significantly impact overall residential

capacity in Te Awamutu or the wider district, as confirmed by the 2023 Housing Capacity Assessment.

Rezoning Area B offers clear economic and strategic benefits. Situated directly adjacent to an existing commercial centre, the site provides a logical and efficient extension to the TALFRC, avoiding the inefficiencies of developing a standalone commercial area on the urban fringe. This approach supports the sub-region's goal of maintaining distinct, self-sufficient towns and villages with thriving centres that enable people to live, work, play, invest, and visit.

While the Future Proof Strategy suggests that the Waipā District has sufficient plan-enabled land to meet business demand over the next 30 years, this does not fully account for niche business models, such as large format retail, that are not easily accommodated in traditional main street environments. The Property Economics report notes that there is no other suitable commercial site for a Mitre 10 within Te Awamutu, and the PPC addresses this gap by locating commercial development within a key growth area, avoiding adverse effects on the role and function of other established centres.

Expanding the commercial centre will promote greater diversity in services and employment, improve local self-sufficiency, strengthen community identity, and reduce travel between Te Awamutu and Hamilton, aligning with Future Proof Strategy principles for integrated and sustainable urban form.

In addition to its economic and urban development benefits, the PPC delivers environmental gains. It protects natural character and contributes to improved water quality through wetland restoration and enhancement planting. These actions give effect to *Te Ture Whaimana o Te Awa o Waikato* (the Vision and Strategy for the Waikato River) by supporting the restoration of the health and wellbeing of the Waikato and Waipā Rivers.

Finally, the PPC promotes integrated land use and transport planning by supporting active transport modes through the provision of walking and cycling paths, while ensuring sustainable resource use and improving resilience to climate change.

9.5.2 Waipā 2050 District Growth Strategy

Waipā 2050 was updated in 2017. The vision of the strategy is:

“Te whakakotahitanga o te iwi o Waipā kia anga whakamua, kia hapai i te taiao”

“Uniting the people of Waipā for progress while sustaining the environment”.

The Growth Strategy provides an integrated framework for managing growth in Waipā through to 2050. It aims to protect the district’s character, guide settlement patterns, and coordinate infrastructure for cost-effective development. The strategy identifies growth areas, their timing, and infrastructure needs, and allocates population targets across key settlements.

Te Awamutu is earmarked for residential and commercial development. Specifically, Area B falls within the T11 Growth Cell, identified for residential growth through to 2035. This area represents an opportunity for housing in proximity to a commercial node which provides necessary social infrastructure shopping / medical etc. The strategy also identifies that the commercial land supply to 2025 can be accommodated by the Cambridge Road commercial area developed and further commercial needs can be met through development on already-zoned land within and around the town centre.

The Economic Assessment (**Attachment J**) confirms that the primary purpose of this Plan Change to rezone Area B is to enable large-format retail activities where space for such activities is not otherwise available in main retail strip of the Town Centre or on land already zoned Commercial. Furthermore, Area B borders the existing TALFRC zoned Commercial, making commercial development an expected and appropriate use, and supports commercial growth.

Based on the above, the PPC is considered to be consistent with Waipā 2050.

10. ASSESSMENT OF EFFECTS ON THE ENVIRONMENT

Clause 22(2), Schedule 1 of the RMA requires a description of any environmental effects that are anticipated from the implementation of the plan change, in such detail as corresponds with the scale and significance of the actual or potential environmental effects.

As noted, the PPC has been thoroughly reviewed by a range of technical experts, whose reports are appended to this document. This assessment draws on and incorporates the findings of those expert evaluations.

To properly assess the actual or potential environmental effects, it is important to first define the scope of the plan change and the activities it will enable, providing context for the anticipated changes.

The primary objective of the PPC is to establish a consistent and efficient planning framework for Areas A and B. This involves rezoning Area B to align with the existing Commercial zoning of the TALFRC (Area A) and extending the Large Format Retail provisions to apply to Area B, along with associated amendments to relevant provisions, planning maps, and structure plans as outlined in Section 7.2 above.

The intended outcome is a more coherent planning framework that accurately reflects the nature of activities within Areas A and B, enabling future development to be managed in a way that aligns with and supports the broader objectives of the Large Format Retail Area.

Resource consent will continue to be required for any development within the Large Format Retail Area, maintaining existing controls. The PPC will not alter the scale of development permitted within Area A but will extend these controls to Area B through the rezoning and revised provisions.

Specifically for Area B, the Plan Change shifts the anticipated land use from residential to commercial. This change will facilitate regulatory efficiency by establishing a tailored, activity-specific planning framework that removes unnecessary constraints and clearly signals the intended commercial use of Area B, replacing the current residential zoning that allows a wide range of uses.

As the primary impacts of the PPC are focused on Area B, this assessment concentrates exclusively on that area. While Area A is included due to refinements to large format retail provisions, no changes are expected there as a result of this Plan Change.

The following assessment of actual and/or potential effects addresses the following matters:

- Landscape and visual amenity effects;
- Economic effects;
- Transportation effects;
- Ecological effects;
- Effects on infrastructure;
- Effects of natural hazards;
- Geotechnical and Land Disturbance effects;

- Soil Contamination effects; and
- Positive effects.

10.1 Landscape and Visual Amenity Effects

Although the site is currently grazed pasture with a semi-rural character, its Residential Medium Density zoning under the Waipā District Plan indicates a planned shift toward urbanisation. This aligns with the broader growth and intensification strategy outlined in the District Plan. The neighbouring properties to the east and south are similarly zoned, reinforcing the expectation of future urban development in this locality.

The proposed building improvement centre will depart from the anticipated residential uses under the current zoning. However, it remains consistent with the broader urban objectives of the District Plan and can be viewed as a logical extension of the TALFRC . The development contributes to a cohesive urban environment, and has been designed to reflect the site's natural and physical opportunities and constraints. Key features include restoration planting to the identified wetland to promote ecological connectivity as well as the extension of a shared cycle and pedestrian path (discussed further below).

The PPC supports a development form that complements the area's evolving mixed-use character. Area B is well suited to accommodate such commercial development due to its location adjacent to the TALFRC , and the ability to incorporate substantial landscape buffers and building setbacks to manage the interface with surrounding residential and semi-rural properties, ensuring an appropriate transition.

Urbanisation of the site will inevitably alter its character, introducing built form into a setting that has remained largely rural in appearance. This will have some visual and character implications, particularly for adjoining rural land to the east and south. However, this change is anticipated by the District Plan and reflects a wider pattern of urban expansion in the area. Given the nature and scale of the development, and the expectation that adjacent sites will also urbanise over time, the proposal adopts an approach that embraces this transition rather than concealing it.

Overall, it is acknowledged that the initial stages of development may give rise to noticeable landscape and visual effects, as is typical with new urban activity in a predominantly semi-rural setting. However, these effects are expected to soften over time as landscaping matures and the wider area transitions toward its planned urban form, consistent with the Waipā District Plan's growth strategy.

10.2 Economic Effects

An Economic Assessment of the PPC has been prepared by Property Economics Limited (**Attachment J**). The assessment reviews the current economic conditions of the Te Awamutu Town Centre ('Town Centre') and evaluates the feasibility of establishing a large-format building improvement centre in Area B, as well as backfilling retail space in Area A. The assessment also considers the potential retail impacts on the Town Centre and the implications of converting residential land to commercial use.

Within the Town Centre, the assessment found that around 50% of businesses are within the Pedestrian Frontage area, which is dominated by food & beverage and apparel retailers. In contrast, hardware and automotive stores, along with larger retailers are located outside this core area. The retail distribution, supported by a low vacancy rate, reflects a well-functioning town centre. The assessment also highlights a diverse and stable employment base over the past thirteen years, reinforcing the Town Centre's role as the district's economic hub.

Retail Distribution Effects

The proposal to rezone Area B for commercial use is necessary and appropriate, given that Area A (the existing LFR Centre) has reached its permitted floorspace limit, and the Town Centre has limited capacity for further commercial expansion. The rezoning will enable the development of a new building improvement centre that complements the existing LFR Centre rather than competes with it.

The PPC is not likely to impact the Centre's core role or vitality as the retail typologies such as large format retail are already located outside the Town Centre's Pedestrian Frontage Area. Instead, it will diversify the commercial landscape and encourage greater trade activity beyond the pedestrian-focused core. This agglomeration of large-format retail activity is expected to strengthen the local business environment and support broader economic growth.

The proposal also includes repurposing the current Mitre 10 Mega site in Area A for new retail uses. While some may overlap with Town Centre offerings, any impact on sales or foot traffic is expected to be minor and consistent with normal trade competition. Property Economics considers these changes unlikely to affect the Town Centre's strategic function or amenity.

Strong market growth projections are expected to absorb any short-term redistribution effects. Importantly, the TALFRC and Town Centre serve different but complementary retail functions, and consumer use of both is not mutually exclusive.

Furthermore, the repurposing of the Mitre 10 Mega site is anticipated to attract new retailers, improve local spend retention, reduce leakage to Hamilton, and stimulate additional economic activity. This will enhance Te Awamutu's retail offering, support employment growth, and improve overall amenity.

While some minor short-term impacts on the Town Centre may occur, its diverse retail mix and low vacancy rate, coupled with strong market demand, are expected to mitigate any lasting effects. The proposal will not compromise the Town Centre's long-term viability or strategic role.

Loss of Residential Land

The proposal to rezone Area B, comprising of 4.4 hectares of residential land, to commercial use will result in minor loss of residential capacity in Te Awamutu, and has minimal impact given the Waipā District's surplus residential capacity as outlined in the 2023 Housing Capacity Assessment. Although Te Awamutu has been growing faster than projected, and may require more greenfield land in the future, this demand would likely arise regardless of the PPC. Therefore, the proposed PPC does not place any additional burden on the town's growth or infrastructure needs, as further land for both residential and commercial use would be required under continued high growth scenarios.

In this context, the loss of potential residential development on this site (estimated at around 50 dwellings³) is minimal when compared to the district's projected capacity of homes over the short to long term.

Furthermore, the assessment considers that rezoning this land for commercial use now, given its location adjacent to the existing LFR Centre, is more efficient than adding a separate 4-hectare commercial site on the town's outskirts.

On this basis, the PPC is expected to deliver a net economic benefit to the local market and community. The economic advantages of rezoning Area B and enabling additional retail activity in Area A outweigh the potential costs associated with a small loss of residential land, minor relocation of retail demand, and any limited retail impacts on the

³ Based on 40% infrastructure assumptions and a ratio of 500m² per dwelling (as enabled by the District Plan)

Town Centre. The proposal will help stimulate employment and economic growth, strengthen the large format retail offering, and contribute to a more efficient and well-functioning urban environment.

10.3 Transportation Effects

A Transportation Assessment by Traffic Engineering and Management Limited (**Attachment K**) evaluates the potential impacts of the Plan Change on surrounding transport infrastructure.

The assessment reviewed crash data in the vicinity, and identified two reported incidents attributed to driver error, with no concerns raised about the current intersection configurations near the Plan Change Area. Traffic surveys were carried out in 2023 and 2025 at three vehicle access points on Cambridge Road. These are referred to as follows: Access 1 being the primary access between Areas A and B; and Access 2 being the main entry point to Area B. In addition, these surveys recorded “significant numbers of pedestrians”, particularly along the southern side of Cambridge Road and across site access points.

A comparison of the 2023 and 2025 data showed an overall decrease in weekday traffic along Cambridge Road, and an increase on Saturdays. However, these were recognised as isolated ‘snapshots’, and not indicative of long-term traffic trends. Consequently, in agreement with Waipā District Council, a 20% growth rate has been applied to Cambridge Road through traffic, with a 40% rate representing projected growth over 20 years, providing estimated 2045 traffic volumes.

To assess traffic generation from the proposed development, reference was made to traffic surveys conducted at the Warkworth Mitre 10 Mega store over Labour Weekend in 2022. Based on this data, the anticipated traffic volumes for the proposed building improvement centre are as follows:

Times	Number of Trips
Weekday AM peak	214 trips (120 inbound trips/hour and 94 outbound trips)
Weekday PM peak	282 trips (134 inbound trips/hour and 148 outbound trips)
Weekend peak	585 trips (291 inbound trips/hour and 294 outbound trips)

Table 3: Traffic Generation

Trip generation for the proposed development has been assigned to the main access points using the observed traffic movement patterns at Access 2. A growth factor was

also applied to through traffic volumes on Cambridge Road. These combined traffic volumes were used for modelling and are illustrated diagrammatically for each identified peak period within the Transportation Assessment.

Using this data, SIDRA modelling was undertaken to assess three road improvement options; being the existing arrangement, a roundabout option, and a traffic signals option. The analysis found that the most suitable option includes the installation of traffic signals at the intersection of Access 1 and Cambridge Road, the construction of a shared path along the southern side of Cambridge Road (adjacent to Area A), and along the western side of Access 1, as well as a pedestrian facility connecting Areas A and B.

The SIDRA Intersection analysis confirmed that this option performs well across all peak periods. While the signals at Access 1 briefly interrupt through traffic on Cambridge Road during the green phase for Access 1, the impact is minor, with all movements maintaining acceptable levels of delay, Level of Service, and queue lengths. Additionally, this option offers significantly improved pedestrian amenity, with signalised crossings provided providing for pedestrian movements across both Cambridge Road and Access 1. In summary, this option delivers strong traffic performance and enhanced pedestrian safety and connectivity during all peak hours.

Under the current District Plan, all new development within the Te Awamutu Large Format Retail Area requires resource consent, including consideration of the surrounding transport network's safe and efficient operation. As part of the proposed development in Area B, upgrades to the intersection of Access 1 and Cambridge Road, along with improvements to the shared path and pedestrian facilities, are necessary to support the building improvement centre and future growth.

These transport upgrades are incorporated as new provisions within the Large Format Retail Area and will be addressed through the resource consent process. The PPC maintains the requirement to assess access impacts on the surrounding network, particularly at the primary entry point to Area B. Furthermore, access suitability will continued be reviewed as part of future development of the wider area around the site, taking into account planned road improvements and the evolving context of the area, especially in relation to adjacent residential zoned sites.

Overall, the combination of proposed standards, matters of discretion, and assessment criteria for Area B, alongside existing transport provisions, will ensure any impacts on the network are effectively managed.

10.4 Ecological Effects

An Ecological Assessment of Area B has been undertaken by Ecology New Zealand (**Attachment G**). The Ecological Assessment involves conducting site evaluations and surveys of vegetation and habitat types, as well as the classification and delineation of watercourses and wetlands. The report assesses the site's ecological values, identifies development constraints associated with the rezoning of Area B to Commercial, and outlines opportunities for ecological enhancement, such as restoration planting in wetlands and flood-prone areas, fauna and flora management protocols, and sediment runoff controls.

The assessment found that vegetation in Area B primarily consists of low-value exotic pasture grasses and scattered exotic trees, with a small wetland extending from the adjacent western property into Area B by approximately 2 metres. The ecological value of terrestrial vegetation and avifauna is considered low, while habitats for herpetofauna, chiropteran fauna, and wetland species are rated as high. Although the site contains suitable habitats for indigenous species, such as Copper Skinks and Long-tailed Bats, site no such species were found in the on-site surveys.

The assessment concludes that the pre-management effects of the development enabled by the proposed Plan Change, specifically the rezoning of Area B to Commercial, are expected to range from low to moderate. Following implementation of management measures, the effects are anticipated to be low to positive. Ecological benefits will result from excluding livestock from wetlands and streams, implementing effective sediment control, and undertaking enhancement planting to protect and improve the site's ecological values.

The restoration measures identified by Ecology New Zealand are implemented into the provisions proposed to protect and enhance the site's ecological values. These include a landscape around the periphery of the identified wetland habitat and the stormwater management system (discussed further below), which will be planted with indigenous vegetation and protected in perpetuity.

On this basis it is concluded that the adverse ecological effects of the Plan Change Request can be avoided, remedied or mitigated and that the Request has significant opportunities for positive ecological outcomes through identified enhancement opportunities.

10.5 Effects on Infrastructure

An assessment of the capacity of the existing infrastructure network has been prepared by BBO (**Attachment F**). A summary of the existing infrastructure network is detailed in Sections 4.2 and 4.3 of this report.

Wastewater, Water Supply and Utilities Services

The assessment examines the anticipated demand on wastewater and water supply networks from the proposed commercial activity within Area B, and compares this with the likely demand from residential development permitted under the current District Plan ('status quo'). This comparison is based on residential densities enabled by the provisions of the District Plan (i.e., minimum net site area of 500m²). The assessment concludes that the infrastructure demand associated with the proposed building improvement centre is lower than that which would result from full residential development of Area B.

A high-level infrastructure assessment confirms that Area B can be efficiently serviced. The existing 150mm gravity sewer main and 200mm water main have sufficient capacity for the proposed building improvement centre, with their proximity reducing the need for off-site upgrades.

On this basis, the level of development enabled by the Plan Change would place less strain on infrastructure than development permitted under the existing planning framework, and that there is sufficient wastewater capacity and water supply to service the proposed building improvement centre within Area B. Further detailed assessments will be required to confirm the adequacy of these utilities in meeting the development's demands and to identify any necessary modifications to align with the proposed site layout.

Stormwater

The Plan Change will not affect stormwater management or overland flow to the receiving environment. While the commercial rezoning of the site will significantly increase impervious surfaces, alter the site's hydrology, and stormwater runoff, as with the status quo, future building developments will still require resource consent to address the location and capacity of infrastructure. The Plan Change also maintains the requirement to implement best-practice stormwater design under the relevant guidelines and standards.

Given the absence of formal on-site stormwater infrastructure in Area B, the assessment confirms that development in this area will require a comprehensive stormwater management system. This system will effectively manage on-site runoff, convey upstream flows, and mitigate impacts on the downstream wetland. Key components of the proposed system include stormwater attenuation via a newly constructed wetland designed to accommodate a 100-year storm event, along with water quality treatment through biofiltration gardens and a treatment swale. These infrastructure elements, as they pertain to development enabled by the PPC, will be managed through the resource consent process. The proposed provisions included in this PPC ensure alignment with the principles of the integrated stormwater management system set out in the relevant guidelines and practices.

10.6 Effects of Natural Hazards

The southern boundary of Area B is adjacent to the Mangaohoi Stream floodplain, which contributes to flood risk for part of the site. Area B is currently zoned Residential Medium Density, allowing for more intensive residential development (up to three storeys in height) and vacant lot subdivision with a minimum net site area of 500m². The proposed rezoning of Area B to a Commercial Zone, with the intent to develop a building improvement centre, does not fundamentally increase the risk to people or property from natural flooding hazards. Furthermore, the District Plan includes provisions that apply to new activities and buildings located within floodplains and overland flow paths. These provisions require an assessment of both the impact of development on the flood hazard and the flood hazard's effect on development.

A high-level flood hazard assessment undertaken by BBO for the proposed building improvement centre confirms that the floodplain does not extend into the developable portion of Area B, as identified in the Te Awamutu Large Format Retail Area Plan. However, flood mitigation measures, such as achieving a minimum 500mm freeboard above the 1% AEP flood level in accordance with flood management guidelines, will be necessary. The Applicant acknowledges the requirement to establish appropriate floor levels and implement a suitable stormwater management system to ensure that the effects of flood hazards are avoided, remedied, or mitigated. These matters will form part of any future resource consent processes, in accordance with existing provisions of the Waipa District Plan.

10.7 Geotechnical and Land Disturbance Effects

Area B has been investigated by CWM Sciences, as detailed in **Attachment H**. The assessment found that Area B gently slopes from north to south. The nearest watercourse, the Mangaohoi Stream, is approximately 35 metres from the southwestern boundary, with its channel incised about 4 metres below the site. Infilled relict stream channels and a shallow depression in the northwest, likely filled over time, were also identified. The assessment concludes that the site's natural slopes are stable under static (non-seismic) conditions. Geotechnical recommendations will be considered during future resource consent applications for Area B. As such, any potential adverse effects are expected to be avoided, remedied, or mitigated.

Earthworks will be required to support the proposed development of Area B, including removal of existing structures and improvements, topsoil stripping, bulk earthworks, and site recontouring and will be addressed as part of any future resource consenting process.

Overall, the geotechnical investigation confirms that the earthworks required to implement the Plan Change are expected to be achievable without causing any significant adverse environmental effects.

10.8 Soil Contamination Effects

In accordance with Regulation 5(6) NES:CS, a change in land use is subject to the NES:CS when activities listed on the Ministry for the Environment's Hazardous Activities and Industries List (HAIL) have occurred, are occurring, or are likely to have occurred on the site, and where such activities may pose a risk to human health.

A preliminary site investigation has been undertaken by ENGEO (**Attachment I**). This assessment reviewed both historical and current activities on the land and evaluated the potential for contamination that may affect its suitability for commercial development.

As part of the investigation, ENGEO reviewed historical aerial imagery and site records, confirming the presence of several residential and farm utility buildings on the site since at least 1944, along with evidence of three distinct phases of site earthworks.

The assessment concluded that historical land use activities may fall within the HAIL classification due to the potential presence of contaminants in imported fill or residual effects associated with past buildings. As such, the NES:CS is applicable to the proposal.

However, ENGEO considers the rezoning of the site from residential to commercial to be a Permitted Activity under Regulation 8(4) of the NES:CS, given the nature of the fill and the low likelihood of any risk to human health arising from the proposed land use change.

Further assessment of the fill material will be undertaken prior to the future development within Area B, in accordance with the requirements of the NES:CS.

Based on these findings, it is concluded that the proposed Plan Change to rezone the land as commercial will not result in adverse contamination effects to human health. Any disturbance of potentially contaminated soil can be adequately managed by consenting processes under the NES:CS.

10.9 Positive Effects

Having regard to the preceding assessments, the Proposed Plan Change is expected to deliver positive social and environmental outcomes by extending the existing Large Format Retail Area, thereby increasing commercial development opportunities through an expanded supply of retail space.

In addition to its economic benefits, the development will enhance the transportation environment by enabling improved pedestrian and cycle connections between the Plan Change Area and the land to the east, supporting active transport options. It will also introduce a signalised intersection to maintain the safety and efficiency of the existing transport network.

Environmentally, the proposal identifies and protects ecological areas within the site, ensures stormwater runoff is managed and treated to a standard exceeding that of many urban areas to maintain or even improve water quality in the adjacent wetlands to the west, and incorporates flood management measures that not only improve on-site drainage.

11. SECTION 32 ASSESSMENT

Section 32 of the RMA states:

- (1) *An evaluation report required under this Act must—*
 - (a) *Examine the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of the RMA (s32(1)(a));*

- (b) *Examine whether the provisions in the proposal are the most appropriate way to achieve the objectives (s32(1)(b)) by:*
- (i) identifying other reasonably practicable options for achieving the objectives; and*
 - (ii) assessing the efficiency and effectiveness of the provisions in achieving the objectives; and*
 - (iii) summarising the reasons for deciding on the provisions*
- (c) *contain a level of detail that corresponds to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal.*
- (2) *An assessment under subsection (1)(b)(ii) must –*
- (a) identify and assess the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions, including the opportunities for—*
 - (i) economic growth that are anticipated to be provided or reduced; and*
 - (ii) employment that are anticipated to be provided or reduced; and*
 - (b) if practicable, quantify the benefits and costs referred to in paragraph (a); and*
 - (c) assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.*

This following provides the analysis required under Section 32 of the RMA. The analysis set out below is prepared in accordance with the requirements of Section 32(5) of the RMA:

- (5) *The person who must have particular regard to the evaluation report must make the report available for public inspection at the same time as the proposal is notified.*

11.1 Whether the Objectives Achieve the Purpose of the RMA

Section 32(1)(a) of the RMA requires the evaluation of the extent to which the objectives⁴ of the Plan Change being evaluated are the most appropriate way to achieve the purpose of the RMA.

The purpose of the PPC is to support the efficient use, development, and intensification of the TALFRC. To achieve this, the PPC proposes rezoning the land adjacent to the TALFRCat 638 Cambridge Road from Medium Density Residential to Commercial and to incorporate a comprehensive set of provisions into the planning framework. These provisions will provide clearer guidance for both current and future development within the Plan Change Area, ensuring outcomes that align with the broader objectives of the Commercial Zone, and particularly the District's commercial hierarchy. There are no new or amendments to the objectives of the District Plan proposed as part of this Plan Change.

Section 9.1 of this report outlines the purpose of the RMA and evaluates the Plan Change against its purpose and principles. The RMA seeks to promote the sustainable management of natural and physical resources by enabling people and communities to meet their social, economic, and cultural needs, while safeguarding the environment for future generations, protecting the life-supporting capacity of resources, and managing adverse effects.

The PPC is consistent with this purpose. It facilitates land use and development to support the efficient use, development, and intensification of the TALFRC. This will enhance the range and quality of retail activities available, helping to meet the well-being, health, and safety needs of current and future communities.

In relation to Section 6 of the RMA, the PPC avoids adverse effects on matters of national importance by protecting natural character, indigenous biodiversity (including a natural wetland), and managing natural hazards through on-site stormwater solutions. Environmental effects will be appropriately avoided, remedied, or mitigated through a combination of existing and proposed District Plan provisions.

Under Section 7 of the RMA, the PPC promotes kaitiakitanga and efficient resource use by enabling the TALFRCto grow and intensify in a coordinated and integrated way. It

⁴ Under s32(6), objectives means:

- (a) *for a proposal that contains or states objectives, those objectives:*
- (b) *for all other proposals, the purpose of the proposal.*

enhances amenity values through design measures such as landscape buffers and building setbacks, and supports environmental quality through wetland protection, native planting, and infrastructure measures. The PPC also addresses climate change impacts by incorporating flood hazard management measures.

Section 8 of the RMA, which relates to the Treaty of Waitangi, is acknowledged, and the PPC does not conflict with the principles of the Treaty of Waitangi.

Overall, the objectives of the PPC represent the most appropriate means of achieving the purpose of the RMA.

11.2 Assessment of the Provisions to Achieve the Objectives

Section 32(1)(b) requires an examination of whether the provisions in the proposal are the most effective and efficient way of achieving the objective of the Plan Change, and includes an analysis of the anticipated environmental, economic, social, and cultural benefits and costs, such as economic growth and employment in accordance with Sections 32(1)(b)(ii), and 32(2)(a)(i) and (ii).

11.2.1 Other reasonably practicable options for achieving the objectives

To evaluate whether the PPC is the most appropriate way to achieve the objective of this Plan Change, other reasonably practicable options have been identified. These include:

- Option 1 – Retain the existing Medium Density Residential for Area B (i.e., Status Quo);
- Option 2 – Rezone Area B to Commercial Zone;
- Option 3 – Rezone Area B to Commercial Zone and integrate Area B into the Large Format Retail Centre; and
- Option 4 – Rezone Area B to Industrial Zone;

An evaluation of the options outlined above is provided in Table 1 of **Attachment E**.

A summary of this assessment, focusing on efficiency and effectiveness as determined through the cost-benefit analysis, is presented below.

Option 1 – Status Quo

This option retains the existing Medium Density Residential Zone for Area B, and consequently any proposal to establish and operate a building improvement centre would require resource consent as a non-complying activity.

In this regard, maintaining the current zoning is neither an effective nor efficient way to achieve the objectives of the Plan Change as it conflicts directly with the Medium Density Residential Zone's policies, which seek to avoid non-residential or commercial uses.

The status quo also presents a high consenting risk and offers little certainty regarding development outcomes. It introduces significant inefficiencies and complexities into the resource consent process, as there is no statutory planning framework within the District Plan to guide or support such activities. Furthermore, this option fails to provide a clear or consistent vision for the future use and development of the area, limiting the community's ability to understand or anticipate its future character and function.

From an environmental perspective, no benefits are identified. Instead, the mismatch between the residential zoning and the intended commercial use risks inefficient land use. Economically, while avoiding changes to the District Plan may reduce upfront costs associated with a plan change, the resource consenting process introduces uncertainty, delays, and significant expenses, and has a high risk of being declined.

Socially and culturally, restricting large-format retail growth could compel the development of alternative sites, resulting in inefficient land use, displacement of valued community activities, and fragmentation of the established TALFRC. Such outcomes risk weakening the area's role as a central hub, diminishing accessibility to goods and services, increasing travel distances, and eroding social connections and community cohesion.

Option 2 – Rezone Area B to Commercial Zone

This option limits the Plan Change to rezoning the land to Commercial and removing the qualifying matters from Area B.

While this removes the main barrier to establishing a building improvement centre, which is an improvement over the status quo, it does not promote an integrated approach to managing development form. In particular, it overlooks how the development will harmonize with the anticipated residential intensification nearby and maintain cohesion with the existing TALFRC. Furthermore, the provisions lack explicit measures to support the enhancement of waterbodies.

Nonetheless, this option provides greater certainty for commercial development in Area B by aligning land use with the adjacent TALFRC and encouraging sustainable patterns through setbacks, landscaping, already present in Section 6 (Commercial) of the District

Plan, that protect environmental and amenity values. Permitting a building improvement centre streamlines development while maintaining essential environmental safeguards, although some gaps remain in wetland protection and oversight near sensitive areas.

Economically, the option reduces consenting costs and fosters local growth by creating employment opportunities and establishing a home improvement hub. However, it may also allow smaller retail activities that could potentially affect the vitality of the Town Centre. Additionally, administrative costs will be borne by both Council and applicants.

From a social and cultural perspective, Option 2 is expected to enhance employment, foster social cohesion, and contribute to community vibrancy, with no identified social or cultural costs.

Option 3 – Rezone to Commercial Zone and Large Format Retail Centre

This option expands on Option 2 by incorporating Area B into the Large Format Retail Centre, establishing a cohesive and integrated spatial framework. It improves efficiency and certainty compared to earlier options by clearly specifying Area B's intended use, thereby minimising the time, cost, and uncertainty of resource consent processes.

Although resource consent remains necessary, it will be deemed as a Controlled Activity, narrowing the scope of discretion to effectively manage potential impacts and ensure smooth integration with both the larger retail centre and surrounding residential areas. This approach supports the creation of a vibrant, well-designed urban environment with high-quality built form.

Consequently, this option is the most effective in meeting the Plan Change objectives, facilitating a comprehensively planned development that reflects local characteristics, mitigates environmental impacts, and sustains the town centre's vitality and viability.

Beyond the environmental, economic, social, and cultural outcomes shared with Option 2, this approach enhances protections through bespoke controls on building bulk, placement, setbacks, and landscaping, which preserve the particular amenity values and promote indigenous biodiversity of the Plan Change Area.

Economically, it establishes Area B as a complementary building improvement centre within the retail hub, stimulating local growth. Socially and culturally, it encourages community cohesion via restoration and enhancement planting, and providing for harvesting opportunities and ongoing engagement with mana whenua, thereby reinforcing cultural connections and community well-being.

Option 4 – Rezone to Industrial

This option restricts the Plan Change to removing the zoning and qualifying matters from Area B and rezoning the land to Industrial. Similar to Options 2 and 3, it provides certainty for developing a building improvement centre under Industrial Zone provisions⁵, with economic and social benefits comparable to Option 2. However, it results in a fragmented zoning pattern by placing an industrial site within a predominantly residential area, increasing the risk of potentially incompatible land uses due to the lack of clear direction for the site's intended outcomes. Although the provisions include setbacks and landscaping requirements along residential interfaces, these protections are less robust than those in Option 3 and do not include specific measures for vegetation near waterbodies, which may negatively affect ecological quality. Economically, the provisions are not designed to support large-format retail and may permit light industrial uses that could detract from the vitality of the TALFRC and amenity of the Residential Zone.

Summary

Overall, it is considered that the most appropriate and preferred option is Option 3, where the Plan Change rezones Area B from Medium Density Residential to Commercial, and include the Large Format Retail Centre provisions to Area B.

11.3 Risk of Acting or Not Acting (section 32(2)(c))

This Plan Change includes technical reports that have been prepared to understand the effects of the plan change. These reports assess matters relating to civil engineering, geotechnical, transportation, ground contamination and economic impacts. In this case, there is sufficient information about the subject matter of the provisions to determine the range and nature of environmental effects of the options set out in the report above. For this reason, an assessment of the risk of acting or not acting is not required.

12. CONCLUSION

The Plan Change request from 638 Limited seeks to amend the Waipā District Plan to better enable the efficient and effective use of the land at 638 Cambridge Road, Cambridge (Area B), integrating it seamlessly with the existing TALFRC at 670 Cambridge Road (Area A).

⁵ Because Trade Supplier is a permitted activity in the Industrial zone

The request to advance this Plan Change has been made in accordance with the requirements of Sections 32, 74 and 75, and Schedule 1 of the RMA.

This Plan Change facilitates a shift from the current residential zoning to a building improvement centre, reflecting a more suitable land use given the site's context. The proposed changes remove constraints on developable land that could impede an optimal outcome and include provisions to manage potential visual, amenity, transport, and ecological impacts arising from increased activity and development intensity in relation to neighbouring properties. The Proposed Plan Change is expected to generate positive social, economic, and environmental outcomes by expanding the Large Format Retail Area and creating new commercial opportunities. It enhances the built environment with improved pedestrian and cycle connections and introduces a signalised intersection to ensure safe and efficient transport. Environmentally, the proposal protects sensitive ecological areas, employs advanced stormwater management to preserve wetland water quality, and incorporates flood mitigation measures benefiting both the site and neighbouring properties. Together, these initiatives represent a considered and sustainable advancement in supporting Te Awamutu's urban growth and development objectives.

A Section 32 evaluation has reviewed four options and assessed their efficiency and effectiveness in meeting the objectives of this Plan Change. This analysis confirms the Plan Change as the most appropriate means of achieving the purpose of the RMA and aligning with the relevant Regional Policy Statement and District Plan objectives. The proposal has also been found consistent with the broader statutory framework, including National Policy Statements and National Environmental Standards.

Overall, the Plan Change aligns with the RMA's purpose of promoting the sustainable management of natural and physical resources and is therefore recommended for approval.

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